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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates.	A.20-10-012

MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), AGRICULTURAL ENERGY CONSUMERS ASSOCIATION, AND CALIFORNIA FARM BUREAU FEDERATION FOR ADOPTION OF AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

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Dated: **January 11, 2022**

MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), AGRICULTURAL ENERGY CONSUMERS ASSOCIATION, AND CALIFORNIA FARM BUREAU FEDERATION FOR ADOPTION OF AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

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I.

INTRODUCTION

Pursuant to Rule 12.1 *et seq* of the California Public Utilities Commission's (Commission's) Rules of Practice and Procedure, Southern California Edison Company (SCE), Agricultural Energy Consumers Association (AECA), and California Farm Bureau Federation (CFBF) (collectively referred to as the Settling Parties), file this motion requesting the Commission find reasonable and adopt the "Agricultural and Pumping (A&P) Rate Group Rate Design Settlement Agreement" (Settlement Agreement), which is appended to this Motion as Attachment A.

The Settling Parties have executed a Settlement Agreement that resolves all issues raised in this proceeding regarding A&P-related tariff matters and rate design issues. The Settlement Agreement reflects both uncontested proposals made by SCE in its application and compromise positions reached by the Settling Parties resulting from good-faith settlement negotiations. The Settlement Agreement strikes a reasonable compromise and balance between the Commission's rate design principles of rate stability/certainty and bill impact mitigation, on the one hand, and cost causation and cost responsibility, on the other hand.

Section II of this Motion provides the regulatory background for this proceeding. Section III describes the positions advocated by the Settling Parties and the key terms of the Settlement Agreement. Section IV demonstrates that the Settlement Agreement is reasonable in light of the whole record, consistent with law, and in the public interest, and that it should be adopted without modification. Section V discusses the procedural requests of the Settling Parties for disposing of this Motion and implementing revised rates.

II.

BACKGROUND

This proceeding was initiated by the filing of SCE's application on October 23, 2020, A.20-10-012, along with service of SCE's prepared direct testimony regarding marginal costs, revenue allocation and rate design. On December 22, 2020, SCE served supplemental testimony regarding certain revenue allocation proposals. On January 20, 2021, the Assigned Commissioner and Assigned Administrative Law Judge issued a Scoping Memo and Ruling following a December 16, 2020 prehearing conference. On July 26, 2021, AECA and CFBF, who specifically represent A&P interests, submitted prepared testimony regarding A&P-related tariff matters and rate design issues.[1]

SCE provided notice to all parties of its intent to conduct a settlement conference related to all issues raised in the proceeding, and an initial settlement conference was held on August 12, 2021. Continuing discussions related to the potential settlement of issues in this proceeding occurred among the interested parties after the settlement conference.

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[1] AECA is a nonprofit organization representing the collective interests of many of the state's leading agricultural associations, and it works on behalf of the combined interests of several county farm bureaus and the individual farmers in more than forty agricultural water districts. AECA represents more than 40,000 California agricultural producers. CFBF is California's largest farm organization, working to protect family farms on behalf of its nearly 34,000 members statewide and as part of a nationwide network of more than 5.5 million members.

III.

SUMMARY OF POSITIONS AND SETTLEMENT

The Settlement Agreement resolves all issues raised in this proceeding regarding A&P tariff matters and rate design issues.[2] The major issues resolved in this proceeding include:

- **Common Rate Design Elements and A&P Rate Options** – The structure and design of rate options for A&P customers.
- **Time Management Load Control (TMLC) Devices** – Timeline for discontinuing support for TMLC devices.
- **Removal of Pay-As-You-Grow Special Condition** – Elimination of the Pay-as-You-Grow special condition from Schedules PA-1, PA-2, and TOU-PA-2.

A summary of the Settling Parties' respective positions on these issues and the way they were resolved in the Settlement Agreement is provided below. Appendix A to the Settlement Agreement also provides a comparison exhibit with additional details regarding the Settling Parties' positions and agreed-upon settlement terms.[3] Appendix B to the Settlement Agreement provides illustrative average rates for each A&P rate option, based upon the terms and principles agreed to in the Settlement Agreement.

A. A&P Rate Structure and Rate Options

1. SCE's Position

SCE proposed the following regarding A&P rate structure and rate options:

- Migrate customers served on Schedules PA-1 and PA-2 to their applicable TOU-PA-2 schedule by 2024/2025 after SCE replaces the meters on Catalina

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2 In addition to the tariff matters and rate design issue discussed herein, as part of the Settlement Agreement, SCE also agreed to meet with interested Settling Parties in advance of preparing its annual fuel and purchase power adjustment sales forecast. The purpose of the meeting is to discuss trends and anticipated changes in load behavior associated with the Agriculture and Pumping segment. This agreement does not commit SCE to adopt a particular methodology or set of assumptions as part of the discussions.

3 Capitalized terms are defined in Paragraph 2 of the Settlement Agreement.

Island with Edison SmartConnect (ESC) meters and then close Schedules PA-1 and PA-2 following this migration;

- Continue to offer Option D as the base rate (and default rate) for customers in the TOU-PA-2 class (monthly demands up to 199 kW), with Option E, Option Critical Peak Pricing (CPP), and Option Real Time Pricing (RTP) also offered as optional rates;
- Continue to offer Option D as the base rate for customers in the TOU-PA-3 class (monthly demands of 200 kW up to 500 kW, unless exempted from the 500 kW threshold in which case demands can exceed 500 kW), with Option CPP the default rate and Option E and Option RTP also offered as optional rates;
- Establish a monthly customer charge of approximately $59 for TOU-PA-2 service and approximately $230 for TOU-PA-3 service;
- Revise TOU energy, Time-Related Demand (TRD), and Facilities-Related Demand (FRD) charges to reflect updated marginal costs and revenue allocations, as described in Exhibits SCE-02 and SCE-03;
- Update the voltage discount;
- Update the Power Factor rate for TOU-PA-3;
- Align Schedule Agricultural and Pumping – Interruptible (AP-I) with the underlying base rate attributes adopted in this proceeding;
- Transition former Super-Off-Peak (SOP) customers on legacy rate options to the applicable default or optional rate schedules for their class;
- Continue to allow A&P customers with behind-the-meter solar generation facilities who meet the requirements of D.17-01-006 and D.17-10-018 to be

eligible for Legacy Option A and/or Legacy Option B until the end of their legacy periods.[4]

2. CFBF's Position

CFBF proposed the following:

- Make minor adjustments to Customer Charges, TRD charges, or other charges, and to recover any under collection through some other means, such as through increases in energy charges;
- SCE and other interested Agricultural parties should begin work to study how to change SCE's rate design to move away from most demand charges and toward TOU energy rates.[5]

3. AECA's Position

AECA proposed the following:

- SCE should deliver on the promise of advance metering infrastructure and implement daily demand charges, which have an additional benefit of allowing agricultural customers to sporadically operate late in the peak period without incurring a full month's worth of charges;
- If SCE has compelling reasons to believe that daily demand charges are unworkable, then demand charges should be converted to energy charges for rate options that already have low demand charges.[6]

4. Settlement

a) Common Rate Design Elements

Rate structures for the A&P Rate Group will continue to generally consist of some combination of Customer Charges, TOU or seasonal Energy Charges, TRD Charges and FRD Charges. Illustrative Customer Charges, Energy Charges, TRD Charges, and FRD charges

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4 Exh. SCE-04, pp. 68-72.
5 Exh. CFBF-01, pp. 20-24.
6 Exh. AECA-01, pp. 36-37.

are shown in the Settlement Agreement. When the Settlement Agreement is first implemented, these illustrative charges will be adjusted as described therein.

A&P customers served at higher voltage delivery levels than the design voltage level for their rate class will continue to receive a voltage discount reflecting their lower cost of service. SCE will establish the discount levels based on the difference in marginal costs of service between the design or predominant voltage level for a given rate class and the higher voltage service options. No modifications were proposed for the determination of the voltage discounts.

Finally, the determination of the power factor adjustment (PFA) rates, which are designed to recover the costs of additional capacitors installed by SCE to improve power factor, will not be modified.

b) <u>Available Rate Options</u>

(1) <u>Schedules PA-1 and PA-2</u>

SCE's proposal was uncontested. Thus, Schedules PA-1 and PA-2 are retained for customers located on Catalina Island. Because of the limited applicability of these schedules, proposed rate factors are set based on a functional system average percentage change (SAPC) adjustment using the updated revenue allocation for each class. SCE plans to replace the meters on Catalina with Edison SmartConnect (ESC) meters in 2022 and migrate these customers to their applicable TOU-PA-2 rate schedule by 2024/2025. SCE shall close Schedules PA-1 and PA-2 upon completion of the transition.

(2) <u>Schedule TOU-PA-2</u>

For TOU-PA-2, the Customer Charges will be set at current levels to moderate bill impacts as customers continue to transition to the new TOU periods adopted in D.18-07-066, with the recovery of any customer marginal cost deficiencies included in the FRD Charge. Option D will continue to be the default rate. Under Option D:

- For distribution, recovery is via TOU Energy Charges that recover approximately 50 percent of Peak-capacity costs for all

TOU periods with smoothing and moderated TOU rate differentials to mitigate bill impacts, a summer on-peak TRD Charge that recovers approximately 50 percent of summer Peak-capacity costs, and an FRD Charge that recovers Grid-related costs and 50 percent of the remaining Peak-related costs of the mid-, off-, and super-off-peak period;

- For generation, TOU Energy Charges recover generation energy costs and a portion of generation capacity costs not recovered in the TRD Charge, with moderated TOU differentials in the winter to mitigate bill impacts.

SCE will also continue to offer a menu of rate options in addition to Option D, including Option E, Option CPP, and Option RTP. Under Option E:

- For distribution, TOU Energy Charges recover all Peak-capacity costs with smoothing and TOU rate differential moderation to mitigate bill impacts, and an FRD Charge recovers all Grid-related costs;
- For generation, recovery is via TOU Energy charges, with moderated TOU differentials in the winter to mitigate bill impacts

For Option CPP, the event periods will continue to coincide with the TOU peak periods (i.e., weekdays from 4-9 pm) and bill protection will continue to be offered to customers for up to one year. The CPP event charge shall be set at $0.80/kWh. No structural changes are proposed for Option RTP.

Finally, A&P customers with behind-the-meter solar generation facilities who meet the requirements of D.17-01-006 and D.17-10-018 will remain eligible for Legacy Option A and/or Legacy Option B, until the end of their legacy periods. No structural changes to the Legacy Option A and Legacy Option B rate options are proposed in the Settlement Agreement.

(3) Schedule TOU-PA-3

For TOU-PA-3, SCE will offer the same menu of rate options it does for TOU-PA-2, including Option D, Option E, Option CPP, Option RTP, and Legacy Options A and B. The settled rate structure associated with these rate options is the same as within the TOU-PA-2 class, except that the Customer Charges for TOU-PA-3 rate options shall initially be set at the full equal percent of marginal cost (EPMC) level based on SCE's proposed real economic carrying cost (RECC) customer marginal cost method. The TOU differentials for winter generation energy rates are also different for the TOU-PA-3 rate options. For Option D, the winter generation energy differentials are set based on the 2021 GRC generation marginal cost ratios and for Option E, the differentials are set at the moderated ratios of 3.45/2.75/1. Additionally, Option CPP will continue to be the default rate for customers taking service on this schedule.

(4) Schedule AP-I

SCE's proposal was uncontested. SCE shall continue to provide AP-I credits based on the difference between the customer's average summer on- and winter mid-peak demand. The level of credits shall reflect the incentive budget at the current level.

(5) Transition of Former SOP Customers

In SCE's last GRC Phase 2, SCE, AECA, and CFBF entered into an uncontested settlement agreement, adopted by D.18-11-027, allowing former SOP Customers to take service on Legacy Option A or Legacy Option B rates until the implementation of rates proposed in this application. The Settling Parties agree in this Settlement Agreement that the former SOP Customers that were placed on legacy rate options shall be migrated to the applicable default rate schedule for their class in October of 2022. SCE intends to send communications to impacted customers to inform them that they will be migrating from legacy rates to applicable default-rate schedules.

B. Time Management Load Control (TMLC) Device

1. SCE's Position

A Time Management Load Controller (TMLC) is a device that allows customers to automatically interrupt the operation of their customer-owned equipment during the on-peak period. The TMLC is an optional, utility-owned device installed at the customer's request and is funded through a one-time added facilities cost. The purpose of the device is to provide customers a dependable option to interrupt their operation to avoid the higher cost on-peak period and was designed to work in conjunction with the TOU-PA-SOP rates that were available prior to the implementation of the 2018 GRC Phase 2 rates. At the time, TOU-PA-SOP offered a unique on-peak period at a cost that was significantly much higher than other on-peak prices and seasonality that warranted the need to have these devices installed. Currently, SCE continues to support the remaining TMLC devices. However, due to low participation rates coupled with the proposal to migrate previous SOP customers from the legacy TOU period rates to other available agricultural rate options, SCE proposed to discontinue its support of TMLC devices and to disable active TMLC devices from their corresponding meter.[7]

2. CFBF's Position

CFBF opposed SCE's proposal to terminate the TMLC program on the basis that customers paid for those devices through the one-time added facilities cost and because the TMLC devices continue to provide benefits to customers.[8]

3. AECA's Position

AECA similarly opposed SCE's proposal on the basis that customers have already made investments to manage their loads away from peak hours and part of that investment relies on continued access to a TMLC device.[9]

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[7] Exh. SCE-04, p. 72.
[8] Exh. CFBF-01, pp. 25-27.
[9] Exh. AECA-01, pp. 37-38.

4. Settlement

The Settling Parties agreed to keep the TMLC devices for existing customers until the implementation of the final decision for SCE's 2025 GRC Phase 2 Application or until the customer's TMLC device fails, whichever occurs first. If a customer's TMLC device fails after the approval of the Settlement Agreement, SCE will not replace that TMLC device, and TMLC devices will not be available to new customers. SCE also agreed to reprogram active TMLC devices to shut off during SCE's standard On-Peak period from 4 p.m. to 9 p.m. or the optional 5 p.m. to 8 p.m. On-Peak period during summer weekdays. Finally, SCE will send communications to impacted customers to inform them of these changes.

C. Removal of Pay-As-You-Grow Special Condition

1. SCE's Position

Pay-as-You-Grow is a special condition that allows customers on Schedules PA-1, PA-2, and TOU-PA-2 to defer and accumulate payments of their monthly customer charge and service charge or demand charge during the Non-Growing season (November through April) of each year, depending on the rate schedule. An annual agreement is required and must be signed on or before February 15 of the initial year for participation of this Pay-as-You-Grow special condition. Under this agreement, SCE will defer the collection of the monthly charges on bills presented to the customer during the first three months of the agreement term (February through April) in the Non-Growing Season. SCE will collect the deferred revenues and accumulate revenues for application toward the applicable charges during the last three months of the agreement term (November through January) in the Non-Growing Season by doubling these charges on bills presented to the customer during the six months Growing Season from May through October.

The special condition has been in place for over 30 years. However, only a handful of customers opted for this condition when the rate was first established, and the program participation rate continued to decline over the years. SCE has not had customer participation in over two decades. SCE has also learned that customers on these applicable rate schedules generally do not produce income during the time when they are growing, but rather receive payments after crops are being harvested and therefore do not see benefits under the special condition. For these reasons, SCE proposed to eliminate the Pay as You Grow special condition from Schedules PA-1, PA-2, and TOU-PA-2.[10]

2. CFBF and AECA's Positions

CFBF and AECA did not address this issue in their respective testimony.

3. Settlement

SCE's uncontested proposal to remove the Pay-as-You-Grow special condition from Schedules PA-1, PA-2, and TOU-PA-2 was adopted

IV.

REQUEST FOR ADOPTION OF THE SETTLEMENT

The Settlement Agreement is submitted pursuant to Rule 12.1 *et seq*. of the Commission's Rules of Practice and Procedure. The Settlement Agreement is also consistent with Commission decisions on settlements, which express the strong public policy favoring settlement of disputes if they are fair and reasonable in light of the whole record.[11] This policy supports many worthwhile goals, including reducing the expense of litigation, conserving scarce Commission resources, and allowing the Parties to reduce the risk that litigation will produce unacceptable results.[12] As long as a settlement taken as a whole is reasonable in light of the record, consistent with the law, and in the public interest, it should be adopted without change.

The Settlement Agreement complies with Commission guidelines and relevant precedent for settlements. The general criteria for Commission approval of settlements are stated in Rule 12.1(d) as follows:

> The Commission will not approve stipulations or settlements, whether contested or uncontested, unless the stipulation or

[10] Exh. SCE-04, pp. 72-73.
[11] *See, e.g.,* D.88-12-083 (30 CPUC 2d 189, 221-223) and D.91-05-029 (40 CPUC 2d 301, 326).
[12] D.92-12-019, 46 CPUC 2d 538, 553.

> settlement is reasonable in light of the whole record, consistent with law, and in the public interest.[13]

The Settlement Agreement meets the criteria for a settlement pursuant to Rule 12.1(d), as discussed below.

A. <u>The Settlement Agreement is Reasonable In Light Of the Record</u>

The prepared testimony, the Settlement Agreement itself, and this motion contain the information necessary for the Commission to find the Settlement Agreement reasonable in light of the record. Prior to the settlement, the Settling Parties conducted discovery and served testimony on the issues related to A&P tariff matters and rate design. On December 13, 2021, the Settling Parties moved for admission of their testimony into the evidentiary record as part of the Joint Motion of SCE and the Parties to the Marginal Cost and Revenue Allocation Settlement Agreement for Admission of Evidence into the Evidentiary Record.

The Settlement Agreement represents a reasonable compromise of the Settling Parties' positions in light of the inherent risks and costs of continued litigation. Without divulging the content of confidential settlement negotiations, concessions by Settling Parties on some issues were offset by concessions by other Settling Parties on other issues, as is the case with almost every settlement. In reaching agreement on the tariff matters and rate design issues discussed herein, the Settling Parties carefully considered the impact to agricultural customers who had modified operations and made investments to adapt to the legacy TOU periods and the operational challenges unique to agricultural customers that have been required in the adjustment to the new TOU periods adopted in D.18-07-006. The agreements reached on the tariff matters and rate design issues discussed herein balance the continued transition to new costs and structures without penalizing the class of customers for good-faith investments. The Settlement Agreement accordingly represents a series of reasonable tradeoffs and must be viewed as a "package." No single provision should be viewed in isolation, although every individual provision is reasonable, lawful, and in the public interest. In summary, the Settlement

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[13] *See also*, *Re Commission's Rules of Practice and Procedure,* (D.87-11-053), 26 CPUC 2d 96.

Agreement is a reasonable resolution of the following subject areas:

1. A&P Rate Structure and Rate Options

The Settling Parties have agreed to thoughtful, balanced rate design proposals for A&P customers. Some of SCE's rate design proposals were uncontested by CFBF or AECA. These include SCE's proposals for: (1) migrating customers served on Schedules PA-1 and PA-2 to their applicable TOU-PA-2 schedule by 2024/2025 after SCE replaces the meters on Catalina Island with ESC meters, and (2) transitioning former SOP customers on legacy rate options to the applicable default or optional rate schedules for their class. The uncontested proposals strike a correct balance and are consistent both with the Commission's rate design principles and Commission decisions in other rate proceedings.

The Settling Parties also reached reasonable compromises on contested A&P rate structure and design issues, including agreement on various rate structures for the A&P Rate group regarding Customer Charges, TOU or seasonal Energy Charges, TRD Charges, and FRD Charges. The agreement reached is reasonable. Keeping Customer Charges at current levels will mitigate bill impacts, ease the continued transition of A&P customers to the new TOU periods adopted in D.18-07-006, and facilitate customer acceptance of these new TOU periods. The agreed-upon rate structure under the Settlement Agreement is also consistent with the progress made in SCE's last GRC Phase 2 proceeding in time-differentiating distribution rates and recovering more coincident costs via coincident (*i.e.*, non-FRD) charges. Finally, SCE will continue to offer a menu of rate options—including Option D, Option E, Option CPP and Option RTP—for A&P customers to elect depending upon their electrical needs. This optionality provides A&P customers additional flexibility and an opportunity to mitigate bill impacts.

2. Time Management Load Control (TMLC) Device

The Settling Parties also reached reasonable compromise on SCE's proposal to discontinue its support of TMLC devices and to disable active TMLC devices from their corresponding meter. Instead of discontinuing support immediately as proposed by SCE or continuing support indefinitely as proposed by AECA and CFBF, the Settling Parties were able to reach a middle ground. Customers will be able to keep their active TMLC devices until the implementation of the final decision for SCE's 2025 GRC Phase 2 Application or until the customer's TMLC device fails, whichever occurs first. This balances SCE's desire to phase out the TMLC devices for the reasons stated in its testimony, with AECA and CFBF's desire to ease this transition for customers which are currently depending on their active TMLC devices.

3. Removal of Pay-as-You-Grow Special Condition

Finally, the removal of the pay-as-you-grow special condition is reasonable. This proposal by SCE was uncontested. Additionally, as explained in SCE's testimony, SCE has not had customer participation for this special condition in over two decades. SCE has also learned that customers on these applicable rate schedules generally do not produce income during the time when they are growing, but rather receive payments after crops are being harvested and therefore do not see benefits under the special condition.

B. The Settlement Agreement is Consistent with the Law

Every provision of the Settlement Agreement is lawful. The Settling Parties believe that the terms of the Settlement Agreement comply with all applicable statutes and prior Commission decisions, and reasonable interpretations thereof, including D.17-01-006, D.17-10-018 and D.18-07-006. In agreeing to the terms of the Settlement Agreement, the Settling Parties have explicitly considered the relevant statutes and Commission decisions and believe that the Commission can approve the Settlement Agreement without violating applicable statutes or prior Commission decisions.

C. The Settlement Agreement Is in the Public Interest

This Settlement Agreement is "supported by parties that fairly represent the affected interests" at stake in this proceeding.[14] As the Commission has found, "[w]hile it is true that we employ a 'heightened' focus on the individual elements of a settlement when all interest groups are not accommodated, the focus itself is on whether the settling parties brought to the table

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[14] *See* D.07-11-018, *Order Denying Rehearing of Decision 07-03-044*.

representatives of all groups affected by the settlement. This is not necessarily the same as accommodating the litigation positions of all parties."[15] In this instance, the Settling Parties represent the interests of SCE's A&P customers.

The Settlement Agreement is a reasonable compromise of the Settling Parties' respective positions, as summarized in Section III and IV.A. It fairly resolves the A&P tariff matters and rate design issues raised in this proceeding, and provides greater certainty to A&P customers regarding their present and future costs, which is in the public interest.

The Settlement Agreement, if adopted by the Commission, avoids the cost of further litigation, and frees up Commission resources for other proceedings. Given that the Commission's workload is extensive, the impact on Commission resources is important. The prepared direct testimony contains sufficient information for the Commission to judge the reasonableness of the settlement and for it to discharge any future regulatory obligation with respect to this matter.

V.

CONCLUSION

The Settling Parties seek approval of the terms of the Settlement Agreement so that SCE may implement rates as soon as practicable following the issuance of a final Commission decision approving the Settlement Agreement, but no earlier June 1, 2022.

WHEREFORE, the Settling Parties respectfully request that the Commission:

1. Approve the attached Settlement Agreement, without modification, as reasonable in light of the record, consistent with law, and in the public interest; and

2. Authorize SCE to implement changes in rates and tariffs in accordance with the terms of the Settlement Agreement.

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[15] D.07-11-018 (citing *Re Southern California Edison Company, 1996*, 64 Cal.P.U.C.2d 241, 267).

Respectfully submitted,

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And on behalf of the Settling Parties.[16]

January 11, 2022

[16] Pursuant to Rule 1.8(d), SCE has been authorized to file this motion on behalf of the Settling Parties.

Appendix A

Agricultural And Pumping Rate Group Design Settlement Agreement

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates.	A.20-10-012

AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

Dated: **January 11, 2022**

Agricultural and Pumping Rate Group Rate Design Settlement Agreement

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AGRICULTURAL AND PUMPING RATE GROUP RATE DESIGN SETTLEMENT AGREEMENT

This Agricultural and Pumping (A&P) Rate Group Rate Design Settlement Agreement (Agreement or Settlement Agreement) is entered into by and among Southern California Edison Company (SCE), the Agricultural Energy Consumers Association (AECA), and the California Farm Bureau Federation (CFBF) (collectively referred to hereinafter as Settling Parties).

1. PARTIES

A. SCE is an investor-owned public utility and is subject to the jurisdiction of the California Public Utilities Commission (Commission or CPUC) with respect to providing electric service to its CPUC-jurisdictional retail customers.

B. AECA is a nonprofit organization representing the collective interests of many of the state's leading agricultural associations, and it works on behalf of the combined interests of several county farm bureaus and the individual farmers in more than forty agricultural water districts. AECA represents more than 40,000 California agricultural producers.

C. CFBF is California's largest farm organization, working to protect family farms on behalf of its nearly 34,000 members statewide and as part of a nationwide network of more than 5.5 million members.

2. DEFINITIONS

When used in initial capitalization in this Settlement Agreement, whether in singular or plural, the following terms shall have the meanings set forth below or, if not set forth below, then as they are defined elsewhere in this Settlement Agreement:

A. "Agricultural and Pumping Rate Group" refers to accounts, generally with demands equal to or less than 500 kW,[1] that are eligible for service on the following SCE rate schedules: PA-1 and PA-2 (applicable to non-TOU A&P customers served on Catalina Island), TOU-PA-2 (applicable to A&P customers with monthly demands up to 199 kW), and TOU-PA-3 (applicable to A&P customers of demands of 200 kW to 500 kW, unless exempted from the 500 kW threshold in which case demands can exceed 500 kW).

B. "AP-I" or "Agricultural and Pumping – Interruptible" is a program that provides a year-round monthly credit to eligible A&P customers with a measured demand of 37 kW or greater, or with at least 50 horsepower of connected load, who allow SCE to temporarily interrupt electric service based on terms and conditions provided in the schedule.

C. "Base Rate" means the rate option (*i.e.,* Option D under this Agreement) in a rate class (*i.e.,* TOU-PA-2 or TOU-PA-3) against which all other options within the rate group are designed to be revenue-neutral.

D. "BTM" means behind-the-meter.

E. "CCA" means Community Choice Aggregation.

F. "Commission" or "CPUC" means the California Public Utilities Commission.

G. "Critical Peak Pricing" or "CPP" means a dynamic pricing rate that provides a high, short-term, CPP energy charge of a predetermined level during 12 events of high load or other high-cost system conditions, as designated by SCE within the approved parameters. Typically, the time and duration of the CPP Energy Charge are predetermined, but the CPP

[1] Pursuant to D.18-01-012, the Applicability section of the TOU-PA-3 tariffs was revised to remove the 500 kW maximum demand threshold for any customer who meets SCE's Tariff Rule 1 definition of "Agricultural Power Service."

event days are not predetermined. Participating customers receive a credit reflected in summer Demand Charges or Energy Charges, where applicable, on all days when CPP events are not called.

H. "Customer Charges" mean the fixed dollar-per-month charges applied to customers[2] in the A&P Rate Group that are designed to recover the fixed customer costs of connection to SCE's system.

I. "DA" means Direct Access.

J. "Default Rate" means the rate option on which a customer is automatically placed when starting service unless the customer requests otherwise.

K. "Demand Charges" mean those charges that are comprised of Facilities-Related Demand (FRD) Charges and Time-Related Demand (TRD) Charges, which are based on a customer's maximum kilowatt (kW) in any time period (*i.e.*, FRD), or during a specified time-of-use (TOU) period (*i.e.*, TRD), within the billing period. Demand Charges recover a portion of SCE's delivery and generation costs, where such charges apply to a specific rate schedule.

L. "Design Demand Marginal Costs" means the incremental cost associated with providing additional capacity on the distribution system.

M. "Distribution Grid" (or "Grid") refers to the portion of DDMCs that are not Distribution Peak related.

N. "Distribution Peak" (or "Peak") refers to the portion of DDMCs that are primarily sized to support the time-sensitive nature of coincident peak demand on the distribution system.

O. "Energy Charges" mean dollar-per-kilowatt-hour (kWh) charges that recover (1) the portion of SCE's generation services revenues not recovered in TRD Charges; (2) the portion of SCE's delivery services revenues that are not recovered in TRD Charges, FRD Charges or Customer Charges; and (3) other delivery services revenues for public purpose

[2] The term "customer" as used in this Agreement generally refers to a service account when used in the context of eligibility and the rates for a particular tariff or rate schedule.

programs (including Energy Efficiency and CARE), New System Generation Service (NSGS), Nuclear Decommissioning, Wildfire Fund Non-bypassable Charge, Fixed Recovery Charge, and CPUC reimbursement fees. Energy Charges are designed to provide a price signal aligned with marginal cost differentials in TOU Energy Charges, where TOU Energy Charges apply to a particular rate schedule.

P. "EPMC" means equal percent of marginal cost. Because marginal cost revenues do not equal the utility's revenue requirement, in general, the utility revenue requirement is allocated to different rate groups in proportion to each rate group's percentage share of marginal cost revenue responsibility by function (*i.e.,* separately for generation versus distribution, and customer).

Q. "ERRA" means Energy Resource Recovery Account.

R. "Former Super-Off-Peak (SOP) Customer" means a customer with an account served on Schedule TOU-PA SOP or TOU-PA-3 SOP prior to the implementation of the 2018 GRC Phase 2 Settlement Agreement.

S. "Facilities-Related Demand Charges" or "FRD Charges" mean the charges applied to customers' monthly peak demands that are not differentiated by TOU or by season, and that are designed to recover certain transmission and distribution costs that are defined to be unrelated to time of use.

T. "Functional SAPC Allocation" means allocation of SCE's revenue requirement to each of SCE's rate groups based on the system average percentage change (SAPC) for the particular function, *e.g.*, generation, or distribution and customer costs.

U. "Legacy Option A" means legacy[3] Schedule A rates. Legacy Option A rates are intended for eligible legacy accounts where the non-standby solar system is located behind the same meter as the load, and for eligible SOP accounts.

[3] SCE is replacing the term "grandfather" with the term "legacy" due to the etymology of the term grandfather. Any discussion referencing legacy rate options herein should be understood to encompass rate options previously referred as "grandfathered" rate options.

V. “Legacy Option B” means legacy Schedule B rates. Legacy Option B rates are intended for legacy standby accounts, legacy accounts that are virtually allocated credits under one of the virtual net energy metering (VNM) or RES-BCT tariff options, and for eligible SOP accounts.

W. “Legacy TOU Periods” means the TOU periods currently in effect for A&P customers, including a summer weekday noon to 6 p.m. on-peak period.

X. “LOLE” means “Loss of Load Expectation,” and it represents the expectation that available generation capacity will be inadequate to supply customer demand at any given moment.

Y. “MECs” means Marginal Energy Costs.

Z. “PLRF” means “Peak Load Risk Factor,” and represents the methodology used to assess capacity constraints on the distribution system and to assign peak-capacity-related design demand marginal costs to TOU periods.

AA. “PTO” means permission to operate.

BB. “Revenue Allocation Settlement Agreement” refers the Revenue Allocation Settlement Agreement filed in this proceeding on December 13, 2021, concurrent with a motion to approve the settlement.

CC. “RECC” or “Real Economic Carrying Charge” means a constant payment in real dollars that includes the recovery of capital investment, earnings, taxes and other capital carrying costs. The RECC, when escalated at the rate of inflation over the life of the asset, recovers the net present value of revenue requirement of a utility investment. It also represents the value of deferring a utility investment by a year.

DD. “Standby service” means SCE’s retail service to customers who supply a part or all of their electrical requirements from an onsite generating facility as defined, interconnected, and operated in accordance with SCE’s Rule 21, Wholesale Distribution Access Tariff (WDAT) or Transmission Owners (TO) tariff, but who will require electric service from SCE’s electrical system during periods of a partial or complete outage of the customer’s generating facility.

EE. "Time-Related Demand Charges" or "TRD Charges" are generation or distribution marginal cost-based, capacity-related charges assigned to TOU periods based on loss-of-load probabilities during the TOU periods.

FF. "TOU" means time-of-use. TOU periods are the time periods established for the provision of electric service in which TRD Charges or Energy Charges may vary in relation to the cost of service, and reflect the TOU periods adopted in D.18-07-006 (the final decision in SCE's 2018 Rate Design Window (RDW) proceeding).

3. RECITALS

A. In Phase 2 of SCE's 2021 General Rate Case (GRC), the Commission allocates SCE's authorized revenue requirement among rate groups and authorizes rate design changes for rate schedules in each rate group.

B. On October 23, 2020, SCE served its initial prepared testimony regarding marginal costs, revenue allocation and rate design in Application (A.) 20-10-012.

C. On November 24, 2020, CFBF submitted a protest expressing concern that agriculture, like many customers of Edison, are facing tremendous economic challenges driven by COVID-19, power outages, and wildfire impacts.[4]

D. On January 20, 2021, the Assigned Commissioner and Assigned Administrative Law Judge issued a Scoping Memo and Ruling following a December 16, 2020 prehearing conference.

E. The Public Advocates Office at the Commission served its initial testimony on June 24, 2021 but did not address A&P rate design issues. Intervenors, including CFBF and AECA, served their initial testimony on revenue allocation and/or A&P rate design issues on July 26 , 2021.

F. SCE provided notice to all parties of its intent to conduct a settlement conference, and an initial settlement conference was held on August 12, 2021.

G. Continuing settlement discussions occurred among the Settling Parties after August 12, 2021.

[4] CFBF protest, p.1.

H. In connection with settlement discussions among the Settling Parties, SCE used billing determinants from March 2019 – February 2020 for bill impact analyses provided in connection with this Agreement.

I. The Settling Parties have evaluated the impacts of the various proposals in this proceeding, desire to resolve all issues related to the design of SCE's A&P rates, and have reached agreement as indicated in Paragraph 4 of this Agreement.

J. Appendix A to this Agreement provides a comparison of the Settling Parties' positions related to A&P rate design issues that have been resolved by this Agreement. In the event of a conflict between the terms of this Agreement and Appendix A, the terms of this Agreement shall control.

K. Appendix B provides illustrative A&P rates resulting from this Settlement Agreement. Consistent with Paragraph 11 of this Settlement Agreement, these class average summaries are for illustrative purposes only and have no precedential value. The rate summaries will be adjusted to reflect SCE's actual revenue requirements in accordance with the provisions of the Revenue Allocation Settlement Agreement when rates are first implemented pursuant to the provisions of this Agreement.

4. AGREEMENT

In consideration of the mutual obligations, covenants and conditions contained herein, the Settling Parties agree to the terms of this Settlement Agreement. Nothing in this Settlement Agreement shall be deemed to constitute an admission by any party that its position on any issue lacks merit or that its position has greater or lesser merit than the position taken by any other Party. This Settlement Agreement is subject to the express limitation on precedent described in Paragraph 11. Unless specifically stated otherwise herein, this Agreement and its terms are intended to remain in effect from the date rate changes are implemented as a result of a Commission decision in this proceeding until a decision is implemented in Phase 2 of SCE's next GRC.

A. Illustrative Rates

The Settling Parties agree that the results of the rate design process illustrated by the rate schedules in Appendix B to this Agreement are reasonable. These rates are based on the A&P Rate

Group's share of the consolidated revenue requirement of $14,388 million described in more detail in Paragraph 4.B(1) of the Revenue Allocation Settlement Agreement. These illustrative rates shall be adjusted consistent with the terms of this Agreement and the CPUC's decision in this proceeding related to the Revenue Allocation Settlement Agreement to reflect SCE's total system revenue requirement when this Agreement is implemented.

B. Common Rate Design Elements

Consistent with SCE's Application, rate structures for the A&P Rate Group will continue to generally consist of some combination of Customer Charges, TOU or seasonal Energy Charges, TRD Charges and FRD Charges. In accordance with D.18-07-006, CPP will continue to be the default rate option for the TOU-PA-3 rate class upon implementation of this Agreement, and will remain available as an option for the other classes within the A&P Rate Group. Optional real-time pricing (RTP) rates also remain available for the A&P Rate Group. Finally, accounts eligible for legacy TOU period rate options in accordance with D.17-01-006 and D.17-10-018 (TOU OIR decisions), will remain on Legacy Option A and/or Legacy Option B until the end of their legacy period.

1) Customer Charges

To mitigate bill impacts and help enable customer acceptance of the new TOU periods adopted in D.18-07-066, Customer Charges for the TOU-PA-2 rate class shall remain at the currently approved level when this Agreement is first implemented, with any balance recovered via the FRD Charge. For TOU-PA-3, the Customer Charge shall be set at the full EPMC level based on SCE's proposed RECC customer marginal cost method. Thereafter, these Customer Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Settlement Agreement when SCE's authorized distribution revenues change. Illustrative monthly Customer Charges are listed in Table 4-1 below:

Table 4-1
Illustrative Monthly Customer Charges

Rate Class	Customer Charge
PA-1	$68.30
PA-2	$68.30
TOU-PA-2	$68.30
TOU-PA-3	$386.75

2) Energy Charges

The use of TOU Energy Charges to recover certain generation and distribution revenues is discussed in the Available Rate Options section below. To mitigate bill impacts and continue to ease the transition of customers to the new TOU periods adopted in D.18-07-066, certain TOU period rate differentials were "smoothed" or moderated as part of the settled rate designs. When this Agreement is first implemented, these illustrative Energy Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with Paragraph 4.B.6 of the Revenue Allocation Settlement Agreement. Thereafter, Energy Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Settlement Agreement when SCE's authorized revenues change.

3) TRD Charges

The base rate (*i.e.*, Option D) for TOU-PA-2 and TOU-PA-3 will continue to collect certain generation capacity costs via TRD charges. However, to reflect the impact of ramp and the need for flexible capacity year-round, generation capacity TRD charges shall apply both in the summer on-peak period (as they currently do) and also in the winter mid-peak period (as they currently do).[5] During the initial implementation, the winter mid-peak generation TRD charges shall be set at the current level. Additionally, a summer on-peak TRD Charge shall apply, which reflects the recovery of approximately 50 percent of the summer Distribution Design Demand Peak-capacity costs. To offer

[5] TRD charges do not apply on weekends or holidays in the winter mid-peak period.

customers a menu of rate options, the "Option E" TOU-PA-2 and TOU-PA-3 rates do not include TRD charges. Illustrative TRD Charges are shown in Table 4-2 below.

Table 4-2
Illustrative TRD Charges ($/kW)

Rate Class	Summer On-Peak (Generation)	Summer On-Peak (Distribution)	Winter Mid-Peak (Generation)
TOU-PA-2	10.41	3.24	2.16
TOU-PA-3	11.12	3.86	2.18

When this Agreement is first implemented, these estimated TRD Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with the Paragraph 4.B.6 of the Revenue Allocation Settlement Agreement. Thereafter, these estimated TRD Charges shall be adjusted consistent with Paragraph 4.B.7.a of the Revenue Allocation Agreement when SCE's authorized generation or distribution revenues change.

4) FRD Charges

Both Options D and E of TOU-PA-2 and TOU-PA-3 include an FRD Charge, which is designed to recover certain allocated delivery revenues, including SCE's adopted transmission revenues. For distribution-related revenues, the Option D FRD charge is designed to recover the portion of customer marginal costs not recovered via the Customer Charge, approximately 50 percent of peak-related Distribution Design Demand marginal costs of the mid-peak, off-peak, and SOP periods, and all Grid-related Distribution Design Demand marginal costs. For Option E (for distribution), the FRD Charge recovers the portion of customer marginal costs not recovered via the Customer Charge and Grid-related Distribution Design Demand marginal costs. Illustrative FRD Charges are shown in Table 4-3 below.[6]

[6] FRD Charges for the optional 5-8pm D and E rates are reflected in Appendix B.

Table 4-3
Illustrative FRD Charges ($/kW)

Rate Class	Option D	Option E
TOU-PA-2	12.28	10.55
TOU-PA-3	13.09	10.97

When this Agreement is first implemented, the estimated FRD Charges shall be adjusted, as necessary, consistent with SCE's then-current authorized revenues and Paragraph 4.B.6 of the Revenue Allocation Settlement Agreement. The distribution component of the estimated FRD Charges shall be adjusted, as necessary, by the appropriate SAPC distribution scalar consistent with Paragraph 4.B.7.a of the Revenue Allocation Agreement when SCE's authorized revenues change. Similarly, the transmission component of the estimated FRD Charges shall be adjusted, as necessary, by the appropriate Federal Energy Regulatory Commission (FERC) formula rate adjustment when FERC-authorized transmission revenues change.

5) <u>Voltage Discounts</u>

A&P customers served at higher voltage delivery levels than the design voltage level for their rate class will receive a voltage discount reflecting their lower cost of service. SCE will establish the discount levels based on the difference in marginal costs of service between the design or predominant voltage level for a given rate class and the higher voltage service options. No modifications were proposed for the determination of the voltage discounts. Voltage discounts shall apply to the illustrative rate schedules, as indicated in Appendix B.

6) <u>Power Factor Adjustments</u>

No modifications were proposed for the determination of the power factor adjustment (PFA) rates, which are designed to recover the costs of additional capacitors installed by SCE to improve power factor. PFA rates shall apply to the illustrative rate schedules, as indicated in Appendix B.

C. Available Rate Options

1) Schedules PA-1 and PA-2

Schedules PA-1 and PA-2 are retained for customers located on Catalina Island. Because of the limited applicability of these schedules, proposed rate factors are set based on a functional SAPC adjustment using the updated revenue allocation for each class. SCE plans to replace the meters on Catalina with Edison SmartConnect (ESC) meters in 2022 and migrate these customers to their applicable TOU-PA-2 rate schedule by 2024/2025. SCE shall close Schedules PA-1 and PA-2 upon completion of the transition.

2) Schedule TOU-PA-2

SCE shall offer a menu of rate options to A&P customers within the TOU-PA-2 class, including the following:[7]

- Option D (base/default rate) using the standard TOU periods adopted in D.18-07-006;
- Option D-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option E (optional rate) using the standard TOU periods adopted in D.18-07-006;
- Option E-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option CPP (optional rate);
- Legacy Option A and Legacy Option B rates for eligible legacy solar customers.

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[7] Schedule TOU-PA-2 shall additionally continue to include a wind machine credit (*i.e.,* Special Condition 13 of Schedule TOU-PA-2). Customers are also eligible for the RTP rate.

a) **Option D**

The proposed Option D rates reflect a settled rate design structure that incorporates the following key elements using a Customer Charge, TOU Energy Charges, TRD Charges and an FRD Charge:

- TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers continue to transition to the new TOU periods adopted in D.18-07-066, with the recovery of any customer marginal cost revenue deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover approximately 50 percent of Peak-capacity costs for all TOU periods with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers continue to transition to the new TOU periods and experience time-differentiated distribution, a summer on-peak TRD Charge that recovers approximately 50 percent of summer Peak-capacity costs, and an FRD Charge that recovers Grid-related costs and 50 percent of the remaining Peak-related costs of the mid-, off-, and super-off-peak periods;
- For generation, TOU Energy Charges recover generation energy costs and a portion of generation capacity costs not recovered in the TRD Charge, with moderated[8] TOU differentials in the winter to mitigate bill impacts as customers continue to transition to the new TOU rates. The winter mid-peak TRD charges shall initially be set at the current level.

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[8] Winter energy ratios set to 2018 GRC adopted ratios (1.47/1.17/1.0).

b) **Option E**

The proposed Option E rates reflect a settled rate design structure that incorporates the following key elements using a Customer Charge, TOU Energy Charges and an FRD Charge (no TRD Charges):

- TOU periods as adopted in D.18-07-006;
- Customer Charges set at current levels to moderate bill impacts as customers continue to transition to the new TOU periods adopted in D.18-07-066, with the recovery of any customer marginal cost deficiencies included in the FRD Charge;
- For distribution, TOU Energy Charges that recover all Peak-capacity costs with smoothing and moderated TOU rate differentials to mitigate bill impacts as customers continue to transition to new TOU periods and experience time-differentiated distribution charges, and an FRD Charge that recovers all Grid-related costs;
- For generation, recovery is via TOU Energy charges, with moderated[9] TOU differentials in the winter to mitigate bill impacts as customers continue to transition to the new TOU rates.

c) **Option CPP**

The CPP rate option, which is an overlay on Option D, reflects the following:

- CPP event periods shall coincide with the updated TOU peak periods from D.18-07-006 (*i.e.*, weekdays from 4-9 pm);
- The CPP event charge shall be set at $0.80/kWh; and
- Bill protection will be offered to customers for up to one year.

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[9] Winter energy ratios set to 2018 GRC adopted ratios (1.47/1.17/1.0).

d) **Option RTP**

A&P customers will remain eligible for the RTP rate option, with the illustrative rates reflected in Appendix B. No structural changes to the RTP rate option are proposed in this Agreement.

e) **Legacy Options A and B**

A&P customers with behind-the-meter solar generation facilities who meet the requirements of D.17-01-006 and D.17-10-018 will continue to be eligible for Legacy Option A and/or Legacy Option B until the end of their legacy periods. Eligible solar customers may be served on legacy rates for ten years from their individual PTO dates, but not to exceed July 31, 2027 (non-public agencies) or December 31, 2027 (public agencies), as established in D.17-01-006 and D.17-10-018. No structural changes to the Legacy Option A and Legacy Option B rate options are proposed in this Agreement.

3) **Schedule TOU-PA-3**

SCE shall offer a menu of rate options to A&P customers within the TOU-PA-3 class, including the following:

- Option D (base rate) using the standard TOU periods adopted in D.18-07-006;
- Option D-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option E (optional rate) using the standard TOU periods adopted in D.18-07-006;
- Option E-5to8 (optional rate) using the standard TOU periods adopted in D.18-07-006 but with a compressed 5-8pm peak period;
- Option CPP (default rate);
- Legacy Option A and Legacy Option B rates for eligible legacy solar customers.

The descriptions of the settled rate structure associated with the rate options outlined above are consistent with those described above for TOU-PA-2, with the exception that the Customer Charges for TOU-PA-3 rate options shall initially be set the full EPMC level based on SCE's proposed RECC customer marginal cost method. The TOU differentials for winter generation energy rates are also different for the TOU-PA-3 rate options. For Option D, the winter generation energy differentials are set based on the 2021 GRC generation marginal cost ratios and for Option E, the differentials are set at the moderated ratios of 3.45/2.75/1.

4) Schedule AP-I

SCE shall continue to provide AP-I credits based on the customer's average summer on- and winter mid-peak demand. The level of credits shall reflect the incentive budget at the current level as shown in Appendix B.

5) Transition of SOP Customers on Legacy Rates

SCE, AECA, and CFBF entered into an uncontested settlement agreement, adopted by D.18-11-027, allowing Former SOP Customers to take service on an applicable legacy TOU period rate (i.e., Legacy Option A or Legacy Option B rates), until the implementation of rates proposed in this application. Settling Parties agree in this Settlement Agreement that the Former SOP Customers that were placed on legacy rate options shall be migrated to an applicable rate schedule for their class starting in October of 2022. SCE will send communications to impacted customers to inform them that they will be migrating from Legacy rates to applicable rate schedules.

D. Communication Plans

Settling Parties agree to the following customer communication plan upon implementation of this Settlement Agreement:

- SCE will continue to provide the online rate analyzer tool for all customers, including A&P customers, to perform rate analysis on their accounts

- Assigned customers can continue to reach out to their SCE account managers to obtain rate analyses
- SCE will run a Better-off campaign prior to the Summer of 2023. Through the campaign, SCE will perform rate analysis for non-residential accounts and notify customers if they can achieve significant savings by switching to another rate

E. Time Management Load Control (TMLC) Device

Settling Parties agree to keep the TMLC devices for existing A&P customers until the implementation of the final decision for SCE's 2025 GRC Phase 2 Application or until the customer's TMLC device fails, whichever occurs first. Parties agree that, after this Agreement is approved by the Commission, if a customer's TMLC device fails, SCE will not replace that TMLC device. TMLC devices will not be available to new customers. SCE agrees to reprogram active TMLC devices to shut off during SCE's standard On-Peak period from 4 p.m. to 9 p.m. during summer weekdays. SCE will begin reprogramming of the TMLC devices in October 2022 and will complete by May 31, 2023. SCE intends to send communications to impacted customers to inform them of these changes. These communications will request that they contact us if they want their TMLC device(s) reprogrammed or contact AECA and/or CFBF if they are interested in alternatives to the TMLC device.

F. Removal of Pay-As-You-Grow Special Condition

SCE's uncontested proposal to remove the Pay-as-You-Grow special condition from Schedules PA-1, PA-2, and TOU-PA-2 is adopted. The Pay-as-You-Grow special condition allows customers to defer and accumulate payments of their monthly customer charge and service charge or demand charge during the Non-Growing season (November through April) of each year. SCE has not had customer participation in this special condition for over two decades as customers generally do not produce income during the time when they are growing, but rather receive payments after crops are being harvested and therefore do not realize benefits under the special condition. As such, the special condition will be removed from PA-1, PA-2, and TOU-PA-2 tariffs upon implementation of this settlement agreement.

G. Sales Forecast

SCE agrees to meet with interested Settling Parties in advance of preparing its annual fuel and purchase power adjustment sales forecast used in its Energy Resource Recovery Account (ERRA) application as well as its next General Rate Case Phase 2 application. The purpose of the meeting is to discuss trends and anticipated changes in load behavior associated with the Agriculture and Pumping segment as well as potential changes in forecast methodology to account for those trends and changes. This agreement does not commit SCE to adopt a particular methodology or set of assumptions as part of the discussions.

H. Implementing Revenue Changes in Rates

As described in the Revenue Allocation Settlement Agreement,[10] when SCE's authorized revenues change in the future, SCE will first adjust rate levels for the Base Rate schedules (without CPP elements), using a Functional SAPC adjustment. SCE will then rebalance optional rate levels to ensure revenue neutrality between the Base Rate schedule and the optional rate schedules within each individual rate class (*i.e.*, TOU-PA-2, TOU-PA-3). For example, generation revenue changes resulting from SCE's ERRA proceedings shall be allocated on a Functional SAPC basis, *i.e.*, the revised SCE generation revenue requirement would be allocated by applying a generation-level SAPC scalar based on the difference between present rate revenues and proposed rate revenues for the Base Rate schedules. The optional rate schedules will then be adjusted to ensure revenue neutrality on a functional basis within each individual rate class.

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[10] *See* Paragraph 4.B.7 of the Revenue Allocation Settlement Agreement.

5. IMPLEMENTATION OF SETTLEMENT AGREEMENT

It is the intent of the Settling Parties that SCE should be authorized to implement the rates resulting from this Settlement Agreement as soon as practicable following the issuance of a final Commission decision approving this Settlement Agreement, but no earlier than June 1, 2022.

6. INCORPORATION OF COMPLETE AGREEMENT

This Agreement is to be treated as a complete package and not as a collection of separate agreements on discrete issues. To accommodate the interests related to diverse issues, the Settling Parties acknowledge that changes, concessions, or compromises by a Settling Party or Settling Parties in one section of this Agreement resulted in changes, concessions, or compromises by the Settling Parties in other sections. Consequently, the Settling Parties agree to oppose any modification of this Agreement not agreed to by all Settling Parties. If the Commission does not approve this Agreement without modification, the terms and conditions reflected in this Agreement shall no longer apply to the Settling Parties.

7. RECORD EVIDENCE

The Settling Parties request that all of their related prepared testimony be admitted as part of the evidentiary record for this proceeding.

8. SIGNATURE DATE

This Settlement Agreement shall become binding as of the last signature date of the Settling Parties.

9. REGULATORY APPROVAL

The Settling Parties, by signing this Agreement, acknowledge that they support Commission approval of this Agreement and subsequent implementation of all the provisions of the Agreement for the duration of rates implemented pursuant to a Commission order adopting this Agreement in this proceeding, *i.e.*, Phase 2 of SCE's 2021 GRC. The Settling Parties shall use their best efforts to obtain Commission approval of the Agreement. The Settling Parties shall jointly request that the Commission approve the Agreement without change, and find the Agreement to be reasonable, consistent with law and in the public interest.

Should any Proposed Decision or Alternate Proposed Decision seek a modification to this Settlement Agreement, and should any Settling Party be unwilling to accept such modification, that Settling Party shall so notify the other Settling Parties within five business days of issuance of such Proposed Decision or Alternate Proposed Decision. The Settling Parties shall thereafter promptly discuss the proposed modification and negotiate in good faith to achieve a resolution acceptable to the Settling Parties, and shall promptly seek Commission approval of the resolution so achieved. Failure to resolve such proposed modification to the satisfaction of the Settling Parties, or to obtain Commission approval of such resolution promptly thereafter, shall entitle any Settling Party to terminate its participation from this Agreement through prompt notice to the other Settling Parties.

10. COMPROMISE OF DISPUTED CLAIMS

This Settlement Agreement represents a compromise of disputed claims between the Settling Parties. The Settling Parties have reached this Settlement Agreement after taking into account the possibility that each Party may or may not prevail on any given issue. The Settling Parties assert that this Settlement Agreement is reasonable, consistent with law and in the public interest.

11. NON-PRECEDENT

Consistent with Rule 12.5 of the Commission's Rules of Practice and Procedure, this Settlement Agreement is not precedential in any other pending or future proceeding before this Commission, unless the Commission expressly provides otherwise.

12. PREVIOUS COMMUNICATIONS

The Settlement Agreement contains the entire agreement and understanding between the Settling Parties as to the resolution of A&P rate design issues. In the event there is any conflict between the terms and scope of this Settlement Agreement and the terms and scope of the accompanying joint motion in support of the Settlement Agreement, the Settlement Agreement shall govern.

13. NON-WAIVER

None of the provisions of this Settlement Agreement shall be considered waived by any Party unless such waiver is given in writing. The failure of a Party to insist in any one or more instances upon strict performance of any of the provisions of this Settlement Agreement or take advantage of any of their rights hereunder shall not be construed as a waiver of any such provisions or the relinquishment of any such rights for the future, but the same shall continue and remain in full force and effect.

14. EFFECT OF SUBJECT HEADINGS

Subject headings in this Settlement Agreement are inserted for convenience only, and shall not be construed as interpretations of the text.

15. GOVERNING LAW

This Settlement Agreement shall be interpreted, governed and construed under the laws of the State of California, including Commission decisions, orders and rulings, as if executed and to be performed wholly within the State of California.

16. NUMBER OF ORIGINALS

This Settlement Agreement is executed in counterparts, each of which shall be deemed an original. The undersigned represent that they are authorized to sign on behalf of the Party represented.

Dated: January 11, 2022

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Michael Backstrom

By: Michael Backstrom
Title: Vice President, Regulatory Affairs

Dated: January 11, 2022

AGRICULTURAL ENERGY CONSUMERS ASSOCIATION

/s/ Michael Boccadoro

By: Michael Boccadoro
Title: Executive Director

Dated: January 11, 2022

CALIFORNIA FARM BUREAU FEDERATION

/s/ Kevin Johnston

By: Kevin Johnston
Title: Associate Counsel

Appendix A

Comparison of Parties' Positions on Agricultural and Pumping Rate Design Issues

Comparison of Parties' Positions
Agricultural & Pumping Rate Groups

Issue	SCE	CFBF	AECA	2021 GRC Settled Position
TOU-PA-2, Option D (Base Rate) Rate Design	• Continue to offer Option D • Customer Charge: ~$59/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered via a combination of TOU Energy Charges and TRD Charges • Distribution Peak: recovered via a combination of TOU cent-per-kWh Energy Charges, TRD Charge and FRD Charge • Distribution Grid: recovered via an FRD Charge	• Propose to make minor adjustments to Customer Charges, TRD charges, or other charges and to recover any under collection through some other means, such as through increases in energy charges • Recommends SCE and other interested Agricultural parties begin work to study how to change SCE's rate design to move away from most demand charges and toward time-of-use energy rates	• SCE should deliver on the promise of advance metering infrastructure and implement daily demand charges. • Daily demand charge has an additional benefit of allowing agricultural customers to sporadically operate late in the peak period without incurring a full month's worth of charges. • If SCE has compelling reasons to believe that daily demand charges are unworkable, then AECA proposes that demand charges should be converted to energy charges for rate options that already have low demand charges.	• Offer a modified Option D based on settled rate design that incorporates: o Customer charges set at current levels (deficiencies to be recovered into FRD Charge) o For distribution, TOU Energy Charges recover 50% of Peak capacity costs w/ smoothing and moderated TOU rate differentials to mitigate bill impacts, summer on-peak TRD Charge recovers 50% summer Peak-capacity cost, and FRD Charge recovers Grid-related costs and 50% of remaining Peak-related costs of the mid-peak, off-peak and SOP periods o For generation, TOU Energy Charges recover generation energy costs and a portion of generation capacity costs not recovered in the TRD Charge, with moderated TOU differentials in the winter to mitigate bill impacts as customers transition to the new TOU rates. The winter mid-peak TRD charges shall initially be set at the current level.
TOU-PA-2, Option E (Optional Rate) Rate Design	• Continue to offer Option E (maintain no TRD structure) • Customer Charge: ~$59/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered entirely via TOU cent-per-kWh Energy Charges • Distribution Peak: recovered entirely via cent-per-kWh Energy Charge • Distribution Grid: recovered via an FRD Charge	• Propose to make minor adjustments to Customer Charges, TRD charges, or other charges and to recover any under collection through some other means, such as through increases in energy charges • Recommends SCE and other interested Agricultural parties begin work to study how to change SCE's rate design to move away from most demand charges and toward time-of-use energy rates	• SCE should deliver on the promise of advance metering infrastructure and implement daily demand charges. • Daily demand charge has an additional benefit of allowing agricultural customers to sporadically operate late in the peak period without incurring a full month's worth of charges. • If SCE has compelling reasons to believe that daily demand charges are unworkable, then AECA proposes that demand charges should be converted to energy charges for rate options that	• Offer a modified Option E based on settled rate design that incorporates: o Customer charges set at current levels (deficiencies to be recovered into FRD Charge) o For distribution, TOU Energy Charges recover all Peak-capacity costs with smoothing and TOU rate differential moderation to mitigate bill impacts, an FRD Charge recovers all Grid-related costs, and no distribution TRD o For generation, use SCE's proposal with moderated TOU rate differentials for winter energy rates to mitigate bill impacts

Issue	SCE	CFBF	AECA	2021 GRC Settled Position
			already have low demand charges.	
TOU-PA-3, Option D (Base Rate) Rate Design	• Continue to offer Option D • Customer Charge: ~$230/mo, adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered via a combination of TOU Energy Charges and TRD Charges • Distribution Peak: recovered via a combination of TOU cent-per-kWh Energy Charges, TRD Charge and FRD Charge • Distribution Grid: recovered via an FRD Charge	• Same as TOU-PA-2 Option D above	• Same as TOU-PA-2 Option D above	Same as TOU-PA-2, Option D, with the exception that Customer Charges will be set at the full EPMC level based on SCE's proposed RECC marginal cost method.
TOU-PA-3, Option E (Optional Rate) Rate Design	• Propose to offer Option E as the replacement for Option A (maintain no TRD structure) • Customer Charge: ~$230/mo., adjusted to recover a portion (first 50 kVA) of the FLT costs in the grid distribution demand charge • Generation Energy: recovered via TOU Energy Charges • Generation Capacity: recovered entirely via TOU cent-per-kWh Energy Charges • Distribution Peak: recovered entirely via cent-per-kWh Energy Charge • Distribution Grid: recovered via an FRD Charge	• Same as TOU-PA-2 Option E above	• Same as TOU-PA-3 Option E above	Same as TOU-PA-2, Option E, with the exception that Customer Charges will be set at the full EPMC level based on SCE's proposed RECC marginal cost method.
Solar Legacy Rates (Legacy Options A and B)	• Maintain same eligibility, duration, rate options, and rate structures from the 2018 GRC. ○			Maintain same eligibility, duration, rate options, and rate structures from the 2018 GRC.
Former SOP Customers on Legacy Rates (TOU-PA-2-SOP and TOU-PA-3-SOP)	• Existing SOP Customers currently on legacy rate options will be migrated to the applicable default or optional rate schedules for their class.			• Transition Former SOP Customers on legacy rate options to the applicable rate schedules for their class, starting in October of 2022.
Critical Peak Pricing (CPP)	• Option CPP shall continue to be the default rate option for TOU-PA-3 • CPP event periods will coincide with the updated peak periods (*i.e.*, weekdays from 4-9 p.m.)		• Default D-CPP customers should receive a full and transparent education about the difference between CPP	• Maintain current CPP rate structures and outreach and customer care efforts.

Issue	SCE	CFBF	AECA	2021 GRC Settled Position
	• CPP Event Charge will remain \$0.80/kWh • Bill protection will be offered to customers for up to one year		and standard TOU rates and tariffs	
Schedule AP-I	• Align AP-I with the underlying base rate attributes adopted in this proceeding			• SCE shall continue to provide AP-I credits based on the customer's average summer on- and winter mid-peak demand.
Closing of PA-1 & PA-2	• SCE plans to replace the meters on Catalina with Edison SmartConnect (ESC) meters in 2022 and migrate these customers to their applicable TOU-GS-1 rate schedule in 2024/2025. SCE proposes close Schedule PA-1/PA-2 upon the completion of the transition.			• Adopt SCE's uncontested proposal
Time Management Load Control (TMLC) Device	• Propose to discontinue its support of TMLC devices and disable active TMLC devices from their corresponding meter due to low participation rates coupled with the proposal to migrate Existing SOP Customers from the legacy TOU period rates to other available agricultural rate options.	• Commission should order SCE to retain the existing Time Management Load Controller program for currently enrolled A&P customers.	• SCE should be ordered to leave the TMLCs with the Existing SOP Customers at the customer's option, even if the devices are no longer directly needed as part of the now-defunct rate schedule	• Settling Parties agree to keep the TMLC devices for existing customers until the implementation of the 2025 GRC Phase 2 Application or when the TMLC device fails, whichever occurs first. • TMLC devices will not be available to new customers. Active TMLC devices will be reprogrammed to shut off during SCE's standard On-Peak period from 4 p.m. to 9 p.m. during summer weekdays. • SCE intends to send communications to impacted customers to inform them of these changes. These communications will request that they contact us if they want their TMLC device(s) reprogrammed or contact AECA and/or CFBF if they are interested in alternatives to the TMLC device.
Removal of Pay-As-You-Grow Special Condition	• Propose to eliminate the Pay as You Grow special condition from Schedules PA-1, PA-2, and TOU-PA-2 as there has not been customer participation in over two decades. Customers on these applicable rate schedules generally do not produce income during the time when they are growing, but rather receive payments			• Adopt SCE's uncontested proposal

Issue	SCE	CFBF	AECA	2021 GRC Settled Position
	after crops are being harvested and therefore do not see benefits under the special condition			
Sales Forecast			• Agricultural load forecasting should be revised as described in this testimony to more accurately represent the dominate role variations in water supply availability play in shaping agricultural load, as well as include economic activity in the sector	• SCE agrees to meet with interested Settling Parties in advance of preparing its annual fuel and purchase power adjustment sales forecast. • The purpose of the meeting is to discuss trends and anticipated changes in load behavior associated with the Agriculture and Pumping segment. • This agreement does not commit SCE to adopt a particular methodology or set of assumptions as part of the discussions.

Appendix B

Illustrative Agricultural and Pumping Rate Group Rates

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-D-RTP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.07841	Variable*	Variable*	0.06734	Variable*	Variable*	-14.1%		
Mid-peak	0.07841	Variable*		0.06734	Variable*	Variable*	-14.1%		
Off-Peak	0.04238	Variable*		0.04468	Variable*	Variable*	5.4%		
Winter Season									
Mid-peak	0.05265	Variable*		0.06734	Variable*	Variable*	27.9%		
Off-Peak	0.04903	Variable*		0.04468	Variable*	Variable*	-8.9%		
Super-Off-Peak	0.04693	Variable*		0.03903	Variable*	Variable*	-16.8%		
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	12.27	0.00	12.27	12.28	0.00	12.28	0.1%		0.1%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	3.80	0.00	3.80	3.24	0.00	3.24	-14.7%		-14.7%
Mid-Peak	0.00	0.00		0.00	0.00	0.00			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.15)	0.00	(0.15)	15.4%		15.4%
From 51 kV to 219 kV	(4.23)	0.00	(4.23)	(3.21)	0.00	(3.21)	-24.1%		-24.1%
220 kV and above	(10.17)	0.00	(10.17)	(10.18)	0.00	(10.18)	0.1%		0.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	0.00	(0.06)	(0.06)	0.00	(0.06)	0.0%		0.0%
From 51 kV to 219 kV	(1.60)	0.00	(1.60)	(1.17)	0.00	(1.17)	-26.9%		-26.9%
220 kV and above	(3.80)	0.00	(3.80)	(3.24)	0.00	(3.24)	-14.7%		-14.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00021)	(0.00129)	(0.00150)	(0.00025)	(0.00152)	(0.00177)	19.0%	17.8%	18.0%
From 51 kV to 219 kV	(0.00610)	(0.00301)	(0.00911)	(0.00469)	(0.00341)	(0.00810)	-23.1%	13.3%	-11.1%
220 kV and above	(0.01449)	(0.00304)	(0.01753)	(0.01296)	(0.00343)	(0.01639)	-10.6%	12.8%	-6.5%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%
PA-1									
Energy Charge - $/kWh	0.07605	0.07838	0.15443	0.07594	0.08033	0.15627	-0.1%	2.5%	1.2%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Service Charge - $/hp	5.63	0.00	5.63	5.50	0.00	5.50	-2.3%		-2.3%
Wind Machine Credit- $/hp	0.00	(5.43)	(5.43)	0.00	(5.30)	(5.30)		-2.4%	-2.4%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00086)	(0.00130)	(0.00216)	(0.00106)	(0.00129)	(0.00235)	23.3%	-0.8%	8.8%
From 51 kV to 219 kV	(0.03263)	(0.00284)	(0.03547)	(0.02304)	(0.00281)	(0.02585)	-29.4%	-1.1%	-27.1%
220 kV and above	(0.04126)	(0.00286)	(0.04412)	(0.04086)	(0.00284)	(0.04370)	-1.0%	-0.7%	-1.0%
Voltage Discount, Connected Load - $/Hp									
From 2 kV to 50 kV	(0.04)	0.00	(0.04)	(0.04)	0.00	(0.04)	0.0%		0.0%
From 51 kV to 219 kV	(1.72)	0.00	(1.72)	(1.66)	0.00	(1.66)	-3.5%		-3.5%
220 kV and above	(1.75)	0.00	(1.75)	(1.69)	0.00	(1.69)	-3.4%		-3.4%
PA-2									
Energy Charge - $/kWh									
Summer	0.06193	0.08743	0.14936	0.05935	0.08183	0.14118	-4.2%	-6.4%	-5.5%
Winter	0.04903	0.06111	0.11014	0.04710	0.06685	0.11395	-3.9%	9.4%	3.5%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	12.27	0.00	12.27	12.28	0.00	12.28	0.1%		0.1%
Time Related Demand Charge - $/kW									
Summer Season	0.00	3.50	3.50	0.00	3.46	3.46		-1.1%	-1.1%
Winter Season	0.00	0.00	0.00	0.00	0.00	0.00			
TOU Rate Meter Charge - $/month									
TOU-RTEM	0.00	0.00	0.00	0.00	0.00	0.00			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.15)	0.00	(0.15)	15.4%		15.4%
From 51 kV to 219 kV	(4.23)	0.00	(4.23)	(3.21)	0.00	(3.21)	-24.1%		-24.1%
220 kV and above	(10.17)	0.00	(10.17)	(10.18)	0.00	(10.18)	0.1%		0.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.05)	(0.05)	0.00	(0.09)	(0.09)		80.0%	80.0%
From 51 kV to 219 kV	0.00	(0.16)	(0.16)	0.00	(0.21)	(0.21)		31.3%	31.3%
220 kV and above	0.00	(0.16)	(0.16)	0.00	(0.21)	(0.21)		31.3%	31.3%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00029)	(0.00121)	(0.00150)	(0.00034)	(0.00119)	(0.00153)	17.2%	-1.7%	2.0%
From 51 kV to 219 kV	(0.00846)	(0.00265)	(0.01111)	(0.00643)	(0.00259)	(0.00902)	-24.0%	-2.3%	-18.8%
220 kV and above	(0.02011)	(0.00269)	(0.02280)	(0.01777)	(0.00262)	(0.02039)	-11.6%	-2.6%	-10.6%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-E4									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.10553	0.33623	0.44176	0.10048	0.33528	0.43576	-4.8%	-0.3%	-1.4%
Mid-peak	0.10553	0.07793	0.18346	0.10048	0.08399	0.18447	-4.8%	7.8%	0.6%
Off-Peak	0.05189	0.05253	0.10442	0.05454	0.05549	0.11003	5.1%	5.6%	5.4%
Winter Season									
Mid-peak	0.06977	0.07681	0.14658	0.06555	0.08434	0.14989	-6.0%	9.8%	2.3%
Off-Peak	0.06263	0.06112	0.12375	0.05933	0.06711	0.12644	-5.3%	9.8%	2.2%
Super-Off-Peak	0.05856	0.05219	0.11075	0.05579	0.05731	0.11310	-4.7%	9.8%	2.1%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	10.30	0.00	10.30	10.55	0.00	10.55	2.4%		2.4%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00040)	(0.00129)	(0.00169)	(0.00046)	(0.00152)	(0.00198)	15.0%	17.8%	17.2%
From 51 kV to 219 kV	(0.01167)	(0.00301)	(0.01468)	(0.00907)	(0.00341)	(0.01248)	-22.3%	13.3%	-15.0%
220 kV and above	(0.02781)	(0.00304)	(0.03085)	(0.02615)	(0.00343)	(0.02958)	-6.0%	12.8%	-4.1%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.12)	0.00	(0.12)	20.0%		20.0%
From 51 kV to 219 kV	(3.41)	0.00	(3.41)	(2.66)	0.00	(2.66)	-22.0%		-22.0%
220 kV and above	(8.20)	0.00	(8.20)	(8.45)	0.00	(8.45)	3.0%		3.0%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%
TOU-PA-2-E5									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.15005	0.54105	0.69110	0.10991	0.52674	0.63665	-26.8%	-2.6%	-7.9%
Mid-peak	0.15005	0.12388	0.27393	0.10991	0.17699	0.28690	-26.8%	42.9%	4.7%
Off-Peak	0.05502	0.05286	0.10788	0.05812	0.05349	0.11161	5.6%	1.2%	3.5%
Winter Season									
Mid-peak	0.06713	0.07720	0.14433	0.06566	0.08603	0.15169	-2.2%	11.4%	5.1%
Off-Peak	0.06053	0.06143	0.12196	0.05942	0.06846	0.12788	-1.8%	11.4%	4.9%
Super-Off-Peak	0.05677	0.05246	0.10923	0.05586	0.05846	0.11432			
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	10.30	0.00	10.30	10.55	0.00	10.55	2.4%		2.4%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00040)	(0.00129)	(0.00169)	(0.00046)	(0.00152)	(0.00198)	15.0%	17.8%	17.2%
From 51 kV to 219 kV	(0.01167)	(0.00301)	(0.01468)	(0.00907)	(0.00341)	(0.01248)	-22.3%	13.3%	-15.0%
220 kV and above	(0.02781)	(0.00304)	(0.03085)	(0.02615)	(0.00343)	(0.02958)	-6.0%	12.8%	-4.1%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.12)	0.00	(0.12)	20.0%		20.0%
From 51 kV to 219 kV	(3.41)	0.00	(3.41)	(2.66)	0.00	(2.66)	-22.0%		-22.0%
220 kV and above	(8.20)	0.00	(8.20)	(8.45)	0.00	(8.45)	3.0%		3.0%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-D4									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.07841	0.08665	0.16506	0.06734	0.09211	0.15945	-14.1%	6.3%	-3.4%
Mid-peak	0.07841	0.07793	0.15634	0.06734	0.08399	0.15133	-14.1%	7.8%	-3.2%
Off-Peak	0.04238	0.05253	0.09491	0.04468	0.05549	0.10017	5.4%	5.6%	5.5%
Winter Season									
Mid-peak	0.05265	0.06638	0.11903	0.06734	0.07268	0.14002	27.9%	9.5%	17.6%
Off-Peak	0.04903	0.05283	0.10186	0.04468	0.05784	0.10252	-8.9%	9.5%	0.6%
Super-Off-Peak	0.04693	0.04510	0.09203	0.03903	0.04939	0.08842	-16.8%	9.5%	-3.9%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	12.27	0.00	12.27	12.28	0.00	12.28	0.1%		0.1%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	3.80	12.30	16.10	3.24	10.41	13.65	-14.7%	-15.4%	-15.2%
Mid-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.16	2.16	0.00	2.16	2.16		0.0%	0.0%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.15)	0.00	(0.15)	15.4%		15.4%
From 51 kV to 219 kV	(4.23)	0.00	(4.23)	(3.21)	0.00	(3.21)	-24.1%		-24.1%
220 kV and above	(10.17)	0.00	(10.17)	(10.18)	0.00	(10.18)	0.1%		0.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	(0.11)	(0.17)	(0.06)	(0.16)	(0.22)	0.0%	45.5%	29.4%
From 51 kV to 219 kV	(1.60)	(0.29)	(1.89)	(1.17)	(0.37)	(1.54)	-26.9%	27.6%	-18.5%
220 kV and above	(3.80)	(0.29)	(4.09)	(3.24)	(0.37)	(3.61)	-14.7%	27.6%	-11.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00021)	(0.00091)	(0.00112)	(0.00025)	(0.00092)	(0.00117)	19.0%	1.1%	4.5%
From 51 kV to 219 kV	(0.00610)	(0.00201)	(0.00811)	(0.00469)	(0.00201)	(0.00670)	-23.1%	0.0%	-17.4%
220 kV and above	(0.01449)	(0.00204)	(0.01653)	(0.01296)	(0.00203)	(0.01499)	-10.6%	-0.5%	-9.3%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%
TOU-PA-2-D5									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.09242	0.13881	0.23123	0.07250	0.18764	0.26014	-21.6%	35.2%	12.5%
Mid-peak	0.09242	0.12388	0.21630	0.07250	0.17699	0.24949	-21.6%	42.9%	15.3%
Off-Peak	0.04491	0.05286	0.09777	0.04660	0.05349	0.10009	3.8%	1.2%	2.4%
Winter Season									
Mid-peak	0.05096	0.06673	0.11769	0.07250	0.07462	0.14712	42.3%	11.8%	25.0%
Off-Peak	0.04766	0.05310	0.10076	0.04660	0.05938	0.10598	-2.2%	11.8%	5.2%
Super-Off-Peak	0.04578	0.04534	0.09112	0.04000	0.05071	0.09071	-12.6%	11.8%	-0.4%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	12.81	0.00	12.81	12.61	0.00	12.61	-1.6%		-1.6%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	2.60	12.30	14.90	2.16	9.11	11.27	-16.9%	-25.9%	-24.4%
Mid-Peak	0.00	0.00		0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.23	2.23	0.00	2.23	2.23		0.0%	0.0%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.14)	0.00	(0.14)	(0.15)	0.00	(0.15)	7.1%		7.1%
From 51 kV to 219 kV	(4.46)	0.00	(4.46)	(3.31)	0.00	(3.31)	-25.8%		-25.8%
220 kV and above	(10.71)	0.00	(10.71)	(10.51)	0.00	(10.51)	-1.9%		-1.9%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.04)	(0.11)	(0.15)	(0.04)	(0.14)	(0.18)	0.0%	27.3%	20.0%
From 51 kV to 219 kV	(1.09)	(0.29)	(1.38)	(0.78)	(0.33)	(1.11)	-28.4%	13.8%	-19.6%
220 kV and above	(2.60)	(0.29)	(2.89)	(2.16)	(0.33)	(2.49)	-16.9%	13.8%	-13.8%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00021)	(0.00091)	(0.00112)	(0.00026)	(0.00098)	(0.00124)	23.8%	7.7%	10.7%
From 51 kV to 219 kV	(0.00582)	(0.00201)	(0.00783)	(0.00476)	(0.00215)	(0.00691)	-18.2%	7.0%	-11.7%
220 kV and above	(0.01379)	(0.00204)	(0.01583)	(0.01294)	(0.00217)	(0.01511)	-6.2%	6.4%	-4.5%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2-CPP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.07841	0.08665	0.16506	0.06734	0.09211	0.15945	-14.1%	6.3%	-3.4%
Mid-peak	0.07841	0.07793	0.15634	0.06734	0.08399	0.15133	-14.1%	7.8%	-3.2%
Off-Peak	0.04238	0.05253	0.09491	0.04468	0.05549	0.10017	5.4%	5.6%	5.5%
Winter Season									
Mid-peak	0.05265	0.06638	0.11903	0.06734	0.07268	0.14002	27.9%	9.5%	17.6%
Off-Peak	0.04903	0.05283	0.10186	0.04468	0.05784	0.10252	-8.9%	9.5%	0.6%
Super-Off-Peak	0.04693	0.04510	0.09203	0.03903	0.04939	0.08842	-16.8%	9.5%	-3.9%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	12.27	0.00	12.27	12.28	0.00	12.28	0.1%		0.1%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	3.80	12.30	16.10	3.24	10.41	13.65	-14.7%	-15.4%	-15.2%
Mid-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.16	2.16	0.00	2.16	2.16		0.0%	0.0%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.15)	0.00	(0.15)	15.4%		15.4%
Above 50 kV but below 220 kV	(4.23)	0.00	(4.23)	(3.21)	0.00	(3.21)	-24.1%		-24.1%
At 220 kV	(10.17)	0.00	(10.17)	(10.18)	0.00	(10.18)	0.1%		0.1%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	(0.11)	(0.17)	(0.06)	(0.16)	(0.22)	0.0%	45.5%	29.4%
Above 50 kV but below 220 kV	(1.60)	(0.29)	(1.89)	(1.17)	(0.37)	(1.54)	-26.9%	27.6%	-18.5%
At 220 kV	(3.80)	(0.29)	(4.09)	(3.24)	(0.37)	(3.61)	-14.7%	27.6%	-11.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00021)	(0.00091)	(0.00112)	(0.00025)	(0.00092)	(0.00117)	19.0%	1.1%	4.5%
Above 50 kV but below 220 kV	(0.00610)	(0.00201)	(0.00811)	(0.00469)	(0.00201)	(0.00670)	-23.1%	0.0%	-17.4%
At 220 kV	(0.01449)	(0.00204)	(0.01653)	(0.01296)	(0.00203)	(0.01499)	-10.6%	-0.5%	-9.3%
CPP Event Energy Charge - $/kWh	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer CPP Non-Event Credit									
On-Peak Demand Credit - $/kW	0.00	(5.68)	(5.68)	0.00	(5.68)	(5.68)		0.0%	0.0%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-2 (Rate A) - GF									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.19065	0.21848	0.40913	0.17079	0.21023	0.38102	-10.4%	-3.8%	-6.9%
Mid-peak	0.07919	0.09071	0.16990	0.09013	0.09238	0.18251	13.8%	1.8%	7.4%
Off-Peak	0.04479	0.05725	0.10204	0.05063	0.06045	0.11108	13.0%	5.6%	8.9%
Winter Season									
Mid-peak	0.06102	0.07691	0.13793	0.05012	0.08376	0.13388	-17.9%	8.9%	-2.9%
Off-Peak	0.04011	0.05054	0.09065	0.03789	0.05512	0.09301	-5.5%	9.1%	2.6%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	10.30	0.00	10.30	10.55	0.00	10.55	2.4%		2.4%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00037)	(0.00129)	(0.00166)	(0.00041)	(0.00152)	(0.00193)	10.8%	17.8%	16.3%
From 51 kV to 219 kV	(0.01160)	(0.00301)	(0.01461)	(0.00854)	(0.00341)	(0.01195)	-26.4%	13.3%	-18.2%
220 kV and above	(0.02775)	(0.00304)	(0.03079)	(0.02602)	(0.00343)	(0.02945)	-6.2%	12.8%	-4.4%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	-0.11	0.00	(0.11)	-0.13	0.00	(0.13)	18.2%		18.2%
From 51 kV to 219 kV	-3.43	0.00	(3.43)	-2.77	0.00	(2.77)	-19.2%		-19.2%
220 kV and above	-8.20	0.00	(8.20)	-8.45	0.00	(8.45)	3.0%		3.0%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%
TOU-PA-2 (Rate B) - GF									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.03479	0.06361	0.09840	0.03508	0.06716	0.10224	0.8%	5.6%	3.9%
Mid-peak	0.03479	0.05881	0.09360	0.03508	0.06207	0.09715	0.8%	5.5%	3.8%
Off-Peak	0.03479	0.05725	0.09204	0.03508	0.06045	0.09553	0.8%	5.6%	3.8%
Winter Season									
Mid-peak	0.03479	0.07691	0.11170	0.03508	0.08376	0.11884	0.8%	8.9%	6.4%
Off-Peak	0.03479	0.05054	0.08533	0.03508	0.05512	0.09020	0.8%	9.1%	5.7%
Customer Charge - $/month	68.30	0.00	68.30	68.30	0.00	68.30	0.0%		0.0%
Facilities Related									
Demand Charge - $/kW	16.91	0.00	16.91	15.89	0.00	15.89	-6.0%		-6.0%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	9.29	9.29	0.00	7.38	7.38		-20.6%	-20.6%
Mid-Peak	0.00	2.84	2.84	0.00	2.26	2.26		-20.4%	-20.4%
Wind Machine Credit- $/kW	0.00	(6.33)	(6.33)	0.00	(9.21)	(9.21)		45.5%	45.5%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	-0.20	0.00	(0.20)	-0.22	0.00	(0.22)	10.0%		10.0%
From 51 kV to 219 kV	-6.19	0.00	(6.19)	-4.53	0.00	(4.53)	-26.8%		-26.8%
220 kV and above	-14.81	0.00	(14.81)	-13.79	0.00	(13.79)	-6.9%		-6.9%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.14)	(0.14)	0.00	(0.18)	(0.18)		28.6%	28.6%
From 51 kV to 219 kV	0.00	(0.36)	(0.36)	0.00	(0.42)	(0.42)		16.7%	16.7%
220 kV and above	0.00	(0.36)	(0.36)	0.00	(0.42)	(0.42)		16.7%	16.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	-0.00091	(0.00091)	0.00000	-0.00092	(0.00092)		1.1%	1.1%
From 51 kV to 219 kV	0.00000	-0.00201	(0.00201)	0.00000	-0.00201	(0.00201)		0.0%	0.0%
220 kV and above	0.00000	-0.00204	(0.00204)	0.00000	-0.00203	(0.00203)		-0.5%	-0.5%
California Climate Credit - $/kWh/Meter/Month	(0.00264)	0.00000	(0.00264)	(0.00264)	0.00000	(0.00264)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-D-RTP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.06921	Variable*	Variable*	0.06372	Variable*	Variable*	-7.9%		
Mid-peak	0.06921	Variable*		0.06372	Variable*	Variable*	-7.9%		
Off-Peak	0.04067	Variable*		0.04395	Variable*	Variable*	8.1%		
Winter Season									
Mid-peak	0.04930	Variable*		0.06372	Variable*	Variable*	29.2%		
Off-Peak	0.04693	Variable*		0.04395	Variable*	Variable*	-6.3%		
Super-Off-Peak	0.04248	Variable*		0.03905	Variable*	Variable*	-8.1%		
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Facilities Related									
Demand Charge - $/kW	12.80	0.00	12.80	13.09	0.00	13.09	2.3%		2.3%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	4.07	0.00	4.07	3.86	0.00	3.86	-5.2%		-5.2%
Mid-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.20)	0.00	(0.20)	53.8%		53.8%
Above 50 kV but below 220 kV	(5.39)	0.00	(5.39)	(4.28)	0.00	(4.28)	-20.6%		-20.6%
At 220 kV	(10.09)	0.00	(10.09)	(10.38)	0.00	(10.38)	2.9%		2.9%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	0.00	(0.06)	(0.07)	0.00	(0.07)	16.7%		16.7%
From 51 kV to 219 kV	(1.71)	0.00	(1.71)	(1.40)	0.00	(1.40)	-18.1%		-18.1%
220 kV and above	(4.07)	0.00	(4.07)	(3.86)	0.00	(3.86)	-5.2%		-5.2%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00016)	(0.00119)	(0.00135)	(0.00022)	(0.00150)	(0.00172)	37.5%	26.1%	27.4%
Above 50 kV but below 220 kV	(0.00483)	(0.00279)	(0.00762)	(0.00422)	(0.00336)	(0.00758)	-12.6%	20.4%	-0.5%
At 220 kV	(0.01153)	(0.00281)	(0.01434)	(0.01198)	(0.00338)	(0.01536)	3.9%	20.3%	7.1%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
TOU-PA-3-E4									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.09103	0.30243	0.39346	0.09125	0.28631	0.37756	0.2%	-5.3%	-4.0%
Mid-peak	0.09103	0.06833	0.15936	0.09125	0.07240	0.16365	0.2%	6.0%	2.7%
Off-Peak	0.04940	0.04641	0.09581	0.05260	0.04650	0.09910	6.5%	0.2%	3.4%
Winter Season									
Mid-peak	0.06812	0.08010	0.14822	0.06824	0.08747	0.15571	0.2%	9.2%	5.1%
Off-Peak	0.06129	0.06381	0.12510	0.06146	0.06968	0.13114	0.3%	9.2%	4.8%
Super-Off-Peak	0.04427	0.02323	0.06750	0.04457	0.02536	0.06993	0.7%	9.2%	3.6%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Facilities Related									
Demand Charge - $/kW	10.75	0.00	10.75	10.97	0.00	10.97	2.0%		2.0%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.16)	0.00	(0.16)	60.0%		60.0%
Above 50 kV but below 220 kV	(4.30)	0.00	(4.30)	(3.41)	0.00	(3.41)	-20.7%		-20.7%
At 220 kV	(8.04)	0.00	(8.04)	(8.26)	0.00	(8.26)	2.7%		2.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00031)	(0.00119)	(0.00150)	(0.00043)	(0.00150)	(0.00193)	38.7%	26.1%	28.7%
Above 50 kV but below 220 kV	(0.01029)	(0.00279)	(0.01308)	(0.00869)	(0.00336)	(0.01205)	-15.5%	20.4%	-7.9%
At 220 kV	(0.02266)	(0.00281)	(0.02547)	(0.02330)	(0.00338)	(0.02668)	2.8%	20.3%	4.8%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-E5									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.12926	0.53471	0.66397	0.10112	0.46848	0.56960	-21.8%	-12.4%	-14.2%
Mid-peak	0.12926	0.11325	0.24251	0.10112	0.15362	0.25474	-21.8%	35.6%	5.0%
Off-Peak	0.05119	0.04375	0.09494	0.05567	0.04370	0.09937	8.8%	-0.1%	4.7%
Winter Season									
Mid-peak	0.06753	0.08175	0.14928	0.06917	0.09150	0.16067	2.4%	11.9%	7.6%
Off-Peak	0.06082	0.06512	0.12594	0.06220	0.07288	0.13508	2.3%	11.9%	7.3%
Super-Off-Peak	0.04410	0.02370	0.06780	0.04484	0.02653	0.07137	1.7%	11.9%	5.3%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Facilities Related									
Demand Charge - $/kW	10.75	0.00	10.75	10.97	0.00	10.97	2.0%		2.0%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.16)	0.00	(0.16)	60.0%		60.0%
Above 50 kV but below 220 kV	(4.30)	0.00	(4.30)	(3.41)	0.00	(3.41)	-20.7%		-20.7%
At 220 kV	(8.04)	0.00	(8.04)	(8.26)	0.00	(8.26)	2.7%		2.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00031)	(0.00119)	(0.00150)	(0.00043)	(0.00150)	(0.00193)	38.7%	26.1%	28.7%
Above 50 kV but below 220 kV	(0.01029)	(0.00279)	(0.01308)	(0.00869)	(0.00336)	(0.01205)	-15.5%	20.4%	-7.9%
At 220 kV	(0.02266)	(0.00281)	(0.02547)	(0.02330)	(0.00338)	(0.02668)	2.8%	20.3%	4.8%
TOU-PA-3-D4									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.06921	0.07598	0.14519	0.06372	0.07937	0.14309	-7.9%	4.5%	-1.4%
Mid-peak	0.06921	0.06833	0.13754	0.06372	0.07240	0.13612	-7.9%	6.0%	-1.0%
Off-Peak	0.04067	0.04641	0.08708	0.04395	0.04650	0.09045	8.1%	0.2%	3.9%
Winter Season									
Mid-peak	0.04930	0.06098	0.11028	0.06372	0.06104	0.12476	29.2%	0.1%	13.1%
Off-Peak	0.04693	0.05118	0.09811	0.04395	0.06143	0.10538	-6.3%	20.0%	7.4%
Super-Off-Peak	0.04248	0.03281	0.07529	0.03905	0.03233	0.07138	-8.1%	-1.5%	-5.2%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Minimum Charge - $/kW									
Summer Season	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season	0.00	0.00	0.00	0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW	12.80	0.00	12.80	13.09	0.00	13.09	2.3%		2.3%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	4.07	12.38	16.45	3.86	11.12	14.98	-5.2%	-10.2%	-8.9%
Mid-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.18	2.18	0.00	2.18	2.18		0.0%	0.0%
Off-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.20)	0.00	(0.20)	53.8%		53.8%
From 51 kV to 219 kV	(5.39)	0.00	(5.39)	(4.28)	0.00	(4.28)	-20.6%		-20.6%
220 kV and above	(10.09)	0.00	(10.09)	(10.38)	0.00	(10.38)	2.9%		2.9%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	(0.11)	(0.17)	(0.07)	(0.21)	(0.28)	16.7%	90.9%	64.7%
From 51 kV to 219 kV	(1.71)	(0.29)	(2.00)	(1.40)	(0.49)	(1.89)	-18.1%	69.0%	-5.5%
220 kV and above	(4.07)	(0.29)	(4.36)	(3.86)	(0.49)	(4.35)	-5.2%	69.0%	-0.2%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00016)	(0.00088)	(0.00104)	(0.00022)	(0.00092)	(0.00114)	37.5%	4.5%	9.6%
From 51 kV to 219 kV	(0.00483)	(0.00197)	(0.00680)	(0.00422)	(0.00200)	(0.00622)	-12.6%	1.5%	-8.5%
220 kV and above	(0.01153)	(0.00199)	(0.01352)	(0.01198)	(0.00202)	(0.01400)	3.9%	1.5%	3.6%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3-D5									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.08189	0.12689	0.20878	0.06801	0.16287	0.23088	-16.9%	28.4%	10.6%
Mid-peak	0.08189	0.11325	0.19514	0.06801	0.15362	0.22163	-16.9%	35.6%	13.6%
Off-Peak	0.04286	0.04375	0.08661	0.04528	0.04370	0.08898	5.6%	-0.1%	2.7%
Winter Season									
Mid-peak	0.04843	0.05774	0.10617	0.06801	0.05941	0.12742	40.4%	2.9%	20.0%
Off-Peak	0.04620	0.04846	0.09466	0.04528	0.05979	0.10507	-2.0%	23.4%	11.0%
Super-Off-Peak	0.04201	0.03106	0.07307	0.03917	0.03138	0.07055	-6.8%	1.0%	-3.4%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Minimum Charge - $/kW									
Summer Season	0.00	0.00		0.00	0.00	0.00			
Winter Season	0.00	0.00		0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW	13.34	0.00	13.34	13.51	0.00	13.51	1.3%		1.3%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	2.70	14.12	16.82	2.83	10.44	13.27	4.8%	-26.1%	-21.1%
Mid-Peak	0.00	0.00		0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.98	2.98	0.00	2.98	2.98		0.0%	0.0%
Off-Peak	0.00	0.00		0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.14)	0.00	(0.14)	(0.21)	0.00	(0.21)	50.0%		50.0%
From 51 kV to 219 kV	(5.68)	0.00	(5.68)	(4.45)	0.00	(4.45)	-21.7%		-21.7%
220 kV and above	(10.63)	0.00	(10.63)	(10.80)	0.00	(10.80)	1.6%		1.6%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.04)	(0.13)	(0.17)	(0.05)	(0.21)	(0.26)	25.0%	61.5%	52.9%
From 51 kV to 219 kV	(1.14)	(0.34)	(1.48)	(1.03)	(0.49)	(1.52)	-9.6%	44.1%	2.7%
220 kV and above	(2.70)	(0.34)	(3.04)	(2.83)	(0.49)	(3.32)	4.8%	44.1%	9.2%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00016)	(0.00083)	(0.00099)	(0.00021)	(0.00091)	(0.00112)	31.3%	9.6%	13.1%
From 51 kV to 219 kV	(0.00447)	(0.00183)	(0.00630)	(0.00398)	(0.00199)	(0.00597)	-11.0%	8.7%	-5.2%
220 kV and above	(0.01117)	(0.00185)	(0.01302)	(0.01152)	(0.00201)	(0.01353)	3.1%	8.6%	3.9%
TOU-PA-3-CPP									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.06921	0.07598	0.14519	0.06372	0.07937	0.14309	-7.9%	4.5%	-1.4%
Mid-peak	0.06921	0.06833	0.13754	0.06372	0.07240	0.13612	-7.9%	6.0%	-1.0%
Off-Peak	0.04067	0.04641	0.08708	0.04395	0.04650	0.09045	8.1%	0.2%	3.9%
Winter Season									
Mid-peak	0.04930	0.06098	0.11028	0.06372	0.06104	0.12476	29.2%	0.1%	13.1%
Off-Peak	0.04693	0.05118	0.09811	0.04395	0.06143	0.10538	-6.3%	20.0%	7.4%
Super-Off-Peak	0.04248	0.03281	0.07529	0.03905	0.03233	0.07138	-8.1%	-1.5%	-5.2%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Facilities Related									
Demand Charge - $/kW	12.80	0.00	12.80	13.09	0.00	13.09	2.3%		2.3%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	4.07	12.38	16.45	3.86	11.12	14.98	-5.2%	-10.2%	-8.9%
Mid-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season									
Mid-Peak	0.00	2.18	2.18	0.00	2.18	2.18		0.0%	0.0%
Off-Peak	0.00	0.00	0.00	0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.13)	0.00	(0.13)	(0.20)	0.00	(0.20)	53.8%		53.8%
Above 50 kV but below 220 kV	(5.39)	0.00	(5.39)	(4.28)	0.00	(4.28)	-20.6%		-20.6%
At 220 kV	(10.09)	0.00	(10.09)	(10.38)	0.00	(10.38)	2.9%		2.9%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	(0.06)	(0.11)	(0.17)	(0.07)	(0.21)	(0.28)	16.7%	90.9%	64.7%
Above 50 kV but below 220 kV	(1.71)	(0.29)	(2.00)	(1.40)	(0.49)	(1.89)	-18.1%	69.0%	-5.5%
At 220 kV	(4.07)	(0.29)	(4.36)	(3.86)	(0.49)	(4.35)	-5.2%	69.0%	-0.2%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00016)	(0.00088)	(0.00104)	(0.00022)	(0.00092)	(0.00114)	37.5%	4.5%	9.6%
Above 50 kV but below 220 kV	(0.00483)	(0.00197)	(0.00680)	(0.00422)	(0.00200)	(0.00622)	-12.6%	1.5%	-8.5%
At 220 kV	(0.01153)	(0.00199)	(0.01352)	(0.01198)	(0.00202)	(0.01400)	3.9%	1.5%	3.6%
CPP Event Energy Charge - $/kWh	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer CPP Non-Event Credit									
On-Peak Demand Credit - $/kW	0.00	(6.18)	(6.18)	0.00	(6.18)	(6.18)		0.0%	0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
TOU-PA-3 (Rate A) - GF									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.19041	0.20916	0.39957	0.17698	0.18118	0.35816	-7.1%	-13.4%	-10.4%
Mid-peak	0.07482	0.08018	0.15500	0.09038	0.07766	0.16804	20.8%	-3.1%	8.4%
Off-Peak	0.04346	0.05055	0.09401	0.04992	0.05099	0.10091	14.9%	0.9%	7.3%
Winter Season									
Mid-peak	0.05484	0.06673	0.12157	0.04768	0.07078	0.11846	-13.1%	6.1%	-2.6%
Off-Peak	0.03845	0.04503	0.08348	0.03715	0.04898	0.08613	-3.4%	8.8%	3.2%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Facilities Related									
Demand Charge - $/kW	10.75	0.00	10.75	10.97	0.00	10.97	2.0%		2.0%
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.11)	0.00	(0.11)	(0.16)	0.00	(0.16)	45.5%		45.5%
Above 50 kV but below 220 kV	(4.00)	0.00	(4.00)	(3.27)	0.00	(3.27)	-18.3%		-18.3%
At 220 kV	(8.04)	0.00	(8.04)	(8.26)	0.00	(8.26)	2.7%		2.7%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	(0.00030)	(0.00119)	(0.00149)	(0.00044)	(0.00150)	(0.00194)	46.7%	26.1%	30.2%
Above 50 kV but below 220 kV	(0.01127)	(0.00279)	(0.01406)	(0.00917)	(0.00336)	(0.01253)	-18.6%	20.4%	-10.9%
At 220 kV	(0.02265)	(0.00281)	(0.02546)	(0.02316)	(0.00338)	(0.02654)	2.3%	20.3%	4.2%
TOU-PA-3 (Rate B) - GF									
Energy Charge - $/kWh									
Summer Season									
On-Peak	0.03453	0.05617	0.09070	0.03490	0.05665	0.09155	1.1%	0.9%	0.9%
Mid-peak	0.03453	0.05180	0.08633	0.03490	0.05228	0.08718	1.1%	0.9%	1.0%
Off-Peak	0.03453	0.05055	0.08508	0.03490	0.05099	0.08589	1.1%	0.9%	1.0%
Winter Season									
Mid-peak	0.03453	0.06673	0.10126	0.03490	0.07078	0.10568	1.1%	6.1%	4.4%
Off-Peak	0.03453	0.04503	0.07956	0.03490	0.04898	0.08388	1.1%	8.8%	5.4%
Customer Charge - $/month	343.99	0.00	343.99	386.75	0.00	386.75	12.4%		12.4%
Minimum Charge - $/kW									
Summer Season	0.00	0.00		0.00	0.00	0.00			
Winter Season	0.00	0.00		0.00	0.00	0.00			
Facilities Related									
Demand Charge - $/kW	17.52	0.00	17.52	17.56	0.00	17.56	0.2%		0.2%
Time Related Demand Charge - $/kW									
Summer Season									
On-Peak	0.00	10.23	10.23	0.00	7.83	7.83		-23.5%	-23.5%
Mid-Peak	0.00	2.78	2.78	0.00	2.29	2.29		-17.6%	-17.6%
Winter Season									
Mid-Peak	0.00	0.00		0.00	0.00	0.00			
Off-Peak	0.00	0.00		0.00	0.00	0.00			
Power Factor Adjustment - $/kVA									
Greater than 50 kV	0.54	0.00	0.54	0.66	0.00	0.66	22.2%		22.2%
50 kV or less	0.60	0.00	0.60	0.52	0.00	0.52	-13.3%		-13.3%
Voltage Discount, Facilities Related Demand - $/kW									
From 2 kV to 50 kV	(0.20)	0.00	(0.20)	(0.28)	0.00	(0.28)	40.0%		40.0%
From 51 kV to 219 kV	(7.37)	0.00	(7.37)	(5.88)	0.00	(5.88)	-20.2%		-20.2%
220 kV and above	(14.81)	0.00	(14.81)	(14.85)	0.00	(14.85)	0.3%		0.3%
Voltage Discount, Time-Related Demand - $/kW									
From 2 kV to 50 kV	0.00	(0.15)	(0.15)	0.00	(0.25)	(0.25)		66.7%	66.7%
From 51 kV to 219 kV	0.00	(0.39)	(0.39)	0.00	(0.59)	(0.59)		51.3%	51.3%
220 kV and above	0.00	(0.39)	(0.39)	0.00	(0.59)	(0.59)		51.3%	51.3%
Voltage Discount, Energy - $/kWh									
From 2 kV to 50 kV	0.00000	(0.00088)	(0.00088)	0.00000	(0.00092)	(0.00092)		4.5%	4.5%
From 51 kV to 219 kV	0.00000	(0.00197)	(0.00197)	0.00000	(0.00200)	(0.00200)		1.5%	1.5%
220 kV and above	0.00000	(0.00199)	(0.00199)	0.00000	(0.00202)	(0.00202)		1.5%	1.5%
API									
<=200kW									
Summer Average On Peak - $/kW	(19.62)	0.00	(19.62)	(19.62)	0.00	(19.62)	0.0%		0.0%
Summer Average Mid - Peak - $/kW	0.00	0.00	0.00	0.00	0.00	0.00			
Summer Average Off - Peak - $/kW	0.00	0.00		0.00	0.00	0.00			
Winter Average Mid - Peak - $/kW	(10.87)	0.00	(10.87)	(10.87)	0.00	(10.87)	0.0%		0.0%
>=200kW									
Summer Average On Peak - $/kW	(19.62)	0.00	(19.62)	(19.62)	0.00	(19.62)	0.0%		0.0%
Summer Average Mid - Peak - $/kW	0.00	0.00	0.00	0.00	0.00	0.00			
Summer Average Off - Peak - $/kW	0.00	0.00		0.00	0.00	0.00			
Winter Average Mid - Peak - $/kW	(10.87)	0.00	(10.87)	(10.87)	0.00	(10.87)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
Optional CPP rider < 200 kW									
CPP Event Energy Charge - $/kWh									
TOU-PA-2	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer Non-Event Demand Credit - $/kW									
TOU-PA-2	0.00	(5.68)	(5.68)	0.00	(5.68)	(5.68)		0.0%	0.0%
Default CPP rider > 200 kW									
TOU-PA-3									
2 p.m. to 6 p.m CPP Event Energy Charge - $/kWh	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer On Peak Demand Credit - $/kW	0.00000	(6.18)	(6.18)	0.00000	(6.18)	(6.18)		0.0%	0.0%